

State: Pennsylvania **Filing Company:** John Alden Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Lifetime Independence
Project Name/Number: /

Filing at a Glance

Company: John Alden Life Insurance Company
Product Name: Lifetime Independence
State: Pennsylvania
TOI: LTC03I Individual Long Term Care
Sub-TOI: LTC03I.001 Qualified
Filing Type: Rate - M.U. (Medically underwritten)
Date Submitted: 08/09/2021
SERFF Tr Num: LFCR-132940309
SERFF Status: Closed-Approved
State Tr Num: LFCR-132940309
State Status: Approved
Co Tr Num: PA JALIC 2021 RATE INCREASE

Effective: On Approval
Date Requested:
Author(s): Scarlett Nazari, Anoush Chngidakyan, Darlene Smith, Dianne Bowdish
Reviewer(s): Michael Hibbert (primary), Jim Laverty
Disposition Date: 10/28/2021
Disposition Status: Approved
Effective Date:

State Filing Description:

Proposed aggregate 72.8% increase (3 annual 20% increases) on 202 policyholders of John Alden's individual LTC forms J-5762-P-PA, J-5762-P-1-PA, J-5875-P-PA, J-5875-P-PA (Q), and J-5875-P-1-PA.

State: Pennsylvania **Filing Company:** John Alden Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Lifetime Independence
Project Name/Number: /

General Information

Project Name: Status of Filing in Domicile: Pending
Project Number: Date Approved in Domicile:
Requested Filing Mode: Review & Approval Domicile Status Comments:
Explanation for Combination/Other: Market Type: Individual
Submission Type: New Submission Individual Market Type:
Overall Rate Impact: Filing Status Changed: 10/28/2021
State Status Changed: 10/28/2021
Deemer Date: Created By: Dianne Bowdish
Submitted By: Scarlett Nazari Corresponding Filing Tracking Number:
State TOI: LTC03I Individual Long Term Care

Filing Description:

Please see Transmittal Letter in Supporting Documentation.

Company and Contact

Filing Contact Information

Scarlett Nazari, Manager Product Filing scarlett.nazari@lifecareassurance.com
P.O. Box 4243 818-867-2453 [Phone]
Woodland Hills, CA 91365-4243 818-867-2508 [FAX]

Filing Company Information

(This filing was made by a third party - LCA01)

John Alden Life Insurance	CoCode: 65080	State of Domicile: Wisconsin
Company	Group Code: 19	Company Type:
P.O. Box 4243	Group Name: Assurant Inc Grp	State ID Number:
Woodland Hills, CA 91365-4243	FEIN Number: 41-0999752	
(818) 867-2450 ext. [Phone]		

SERFF Tracking #: LFCR-132940309

State Tracking #: LFCR-132940309

Company Tracking #: PA JALIC 2021 RATE
INCREASE

State: Pennsylvania

Filing Company: John Alden Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Lifetime Independence

Project Name/Number: /

Filing Fees

State Fees

Fee Required? No

Retaliatory? No

Fee Explanation:

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Michael Hibbert	10/28/2021	10/28/2021

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Disapproved	Michael Hibbert	10/25/2021	10/25/2021
Disapproved	Jim Lavery	10/05/2021	10/05/2021
Disapproved	Jim Lavery	08/17/2021	08/17/2021

Response Letters

Responded By	Created On	Date Submitted
Dianne Bowdish	10/27/2021	10/27/2021
Dianne Bowdish	10/05/2021	10/07/2021
Dianne Bowdish	09/28/2021	09/28/2021

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Supporting Document	JALIC PA Objection Response Attachments 08 17 21.xlsx	Dianne Bowdish	09/28/2021	09/28/2021
Supporting Document	John Alden Rate Increase Act Memo Attachment PA in Excel	Dianne Bowdish	08/11/2021	08/11/2021

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Need Excel	Note To Filer	Jim Lavery	08/11/2021	08/11/2021

SERFF Tracking #:	LFCR-132940309	State Tracking #:	LFCR-132940309	Company Tracking #:	PA JALIC 2021 RATE INCREASE
State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Lifetime Independence				
Project Name/Number:	/				

Disposition

Disposition Date: 10/28/2021

Effective Date:

Status: Approved

Comment: Oct 28, 2021

Scarlett Nazari
Life Care Assurance
P.O. Box 4243
Woodland Hills, CA 91365-4243

RE: Proposed aggregate 72.8% increase (3 annual 20% increases) on 202 policyholders of John Alden's individual LTC forms J-5762-P-PA, J-5762-P-1-PA, J-5875-P-PA, J-5875-P-PA (Q), and J-5875-P-1-PA.

Pennsylvania Insurance Department ID # LFCR-132940309

Dear Ms. Nazari:

The Department approves a 20% increase on the above captioned forms.

Sincerely,

Michael Hibbert
Actuary
Bureau of Accident & Health Insurance

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
John Alden Life Insurance Company	20.000%	20.000%	\$68,957	202	\$344,785	20.000%	20.000%

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Transmittal Letter (A&H)		Yes
Supporting Document	Actuarial Certification (A&H)		Yes
Supporting Document	Actuarial Memorandum and Explanatory Information (A&H)		Yes
Supporting Document	Advertisements (A&H)		Yes
Supporting Document	Authorization to File (A&H)		Yes
Supporting Document	Insert Page Explanation (A&H)		Yes
Supporting Document	Rate Table (A&H)		Yes
Supporting Document	Replacement Form with Highlighted Changes (A&H)		Yes
Supporting Document	Advertisement Compliance Certification		Yes
Supporting Document	Reserve Calculation (A&H)		Yes
Supporting Document	Variability Explanation (A&H)		Yes
Supporting Document	John Alden Rate Increase Act Memo Attachment PA in Excel		Yes
Supporting Document	JALIC PA Objection Response Attachments 08 17 21		Yes
Supporting Document	PA Response Letter 08 17 21		Yes
Supporting Document	J-NFO		Yes
Supporting Document	J-NPO		Yes
Supporting Document	JALIC PA Objection Response Attachments 08 17 21.xlsx		Yes
Supporting Document	PA Response Letter 10 05 21		Yes
Supporting Document	JALIC PA Objection Response Attachments 10 05 21		Yes
Supporting Document	PA Response Letter 10 25 21		Yes
Rate	John Alden Rate Increase Act Memo w Attachment PA		Yes
Rate	John Alden PA Revised Rate Tables 20%		Yes

State: Pennsylvania
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Lifetime Independence
Project Name/Number: /

Filing Company: John Alden Life Insurance Company

Objection Letter

Objection Letter Status Disapproved
Objection Letter Date 10/25/2021
Submitted Date 10/25/2021
Respond By Date

Dear Scarlett Nazari,

Introduction:

Oct 25, 2021

Scarlett Nazari
Life Care Assurance
P.O. Box 4243
Woodland Hills, CA 91365-4243

RE: Proposed aggregate 72.8% increase (3 annual 20% increases) on 202 policyholders of John Alden's individual LTC forms J-5762-P-PA, J-5762-P-1-PA, J-5875-P-PA, J-5875-P-PA (Q), and J-5875-P-1-PA.

Pennsylvania Insurance Department ID # LFCR-132940309

Dear Ms. Nazari:

The captioned filing has been reviewed by the Pennsylvania Insurance Department and it has been found that it fails to meet the requirements of our Insurance Company Laws and is therefore disapproved pursuant to the authority granted under Section 4(A) of Act 134, the Accident and Health Filing Reform Act. After you review the letter and if you do not understand the content of it or the disapproval reasons, please contact the Department for further clarification.

The disapproved filing may be resubmitted within 120 days of the date of disapproval. If you choose to resubmit the filing within that time, the filing will become effective for use 30 days after receipt by the Department as provided by Section 4(C) of Act 134, unless the filing is disapproved before the 30 day period expires.

If the Department does not hear from you within 120 days, the Department will close its files on the above captioned filing. After 120 days, the Department will reopen its files and continue its review of the forms if you respond within one year of the date of this letter and furnish duplicate copies of the previously filed forms and all correspondence between you and the Department. If the filing is resubmitted after 120 days, the Department will review it as if it were a new submission under Section 4(A) of Act 134.

The Department cannot approve this filing as submitted but we can offer a 20% increase on the above captioned forms.

If John Alden would like to accept our 20% offer, then please respond with an acceptance letter.

Sincerely,

Michael Hibbert
Actuary
Bureau of Accident & Health Insurance

Conclusion:

Sincerely,

SERFF Tracking #: LFCR-132940309

State Tracking #: LFCR-132940309

Company Tracking #: PA JALIC 2021 RATE
INCREASE

State: Pennsylvania

Filing Company: John Alden Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Lifetime Independence

Project Name/Number: /

Michael Hibbert

State: Pennsylvania
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Lifetime Independence
Project Name/Number: /

Filing Company: John Alden Life Insurance Company

Objection Letter

Objection Letter Status Disapproved
Objection Letter Date 10/05/2021
Submitted Date 10/05/2021
Respond By Date

Dear Scarlett Nazari,

Introduction:

Oct 5, 2021

Scarlett Nazari
Life Care Assurance
P.O. Box 4243
Woodland Hills, CA 91365-4243

RE: Proposed aggregate 72.8% increase (3 annual 20% increases) on 202 policyholders of John Alden's individual LTC forms J-5762-P-PA, J-5762-P-1-PA, J-5875-P-PA, J-5875-P-PA (Q), and J-5875-P-1-PA.

Pennsylvania Insurance Department ID # LFCR-132940309

Dear Ms. Nazari:

The captioned filing has been reviewed by the Pennsylvania Insurance Department and it has been found that it fails to meet the requirements of our Insurance Company Laws and is therefore disapproved pursuant to the authority granted under Section 4(A) of Act 134, the Accident and Health Filing Reform Act. After you review the letter and if you do not understand the content of it or the disapproval reasons, please contact the Department for further clarification.

The disapproved filing may be resubmitted within 120 days of the date of disapproval. If you choose to resubmit the filing within that time, the filing will become effective for use 30 days after receipt by the Department as provided by Section 4(C) of Act 134, unless the filing is disapproved before the 30 day period expires.

If the Department does not hear from you within 120 days, the Department will close its files on the above captioned filing. After 120 days, the Department will reopen its files and continue its review of the forms if you respond within one year of the date of this letter and furnish duplicate copies of the previously filed forms and all correspondence between you and the Department. If the filing is resubmitted after 120 days, the Department will review it as if it were a new submission under Section 4(A) of Act 134.

Please furnish the following information to the Department.

1. (i) Attachment Q2 is labeled "Nationwide Experience Projection With Restated Earned Premiums at the Current Pennsylvania Rate Level from Inception".
- (ii) Attachment Q3 is labeled "Nationwide Experience Projection With Restated Earned Premiums at the Original Rate Level from Inception".
- (iii) The cumulative increase approved in PA to date is 72.5% (i.e. $72.5 = 1.25 * 1.15 * 1.2 - 1$).
- (iv) The 1992 "original rate level" earned premium shown in Attachment Q3 is \$25,360.
- (v) The 1992 "current PA rate level since inception" earned premium shown in Attachment Q3 is similarly \$25,360.

Given the above information, shouldn't the 1992 "current PA rate level since inception" earned premium shown in Attachment Q2 be $(\$25,360) * (1.725) = \$43,746$?

State: Pennsylvania

Filing Company: John Alden Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Lifetime Independence

Project Name/Number: /

Please revise Attachment Q2 or explain why it is currently correct.

2. Please provide Attachment Q2 and Attachment Q3 in Excel.

Sincerely,

James Lavery, FSA, MAAA

Actuary

Bureau of Accident & Health Insurance

Conclusion:

Sincerely,

Jim Lavery

State: Pennsylvania
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Lifetime Independence
Project Name/Number: /

Filing Company: John Alden Life Insurance Company

Objection Letter

Objection Letter Status Disapproved
Objection Letter Date 08/17/2021
Submitted Date 08/17/2021
Respond By Date

Dear Scarlett Nazari,

Introduction:

Aug 17, 2021

Scarlett Nazari
Life Care Assurance
P.O. Box 4243
Woodland Hills, CA 91365-4243

RE: Proposed aggregate 72.8% increase (3 annual 20% increases) on 202 policyholders of John Alden's individual LTC forms J-5762-P-PA, J-5762-P-1-PA, J-5875-P-PA, J-5875-P-PA (Q), and J-5875-P-1-PA.

Pennsylvania Insurance Department ID # LFCR-132940309

Dear Ms. Nazari:

The captioned filing has been reviewed by the Pennsylvania Insurance Department and it has been found that it fails to meet the requirements of our Insurance Company Laws and is therefore disapproved pursuant to the authority granted under Section 4(A) of Act 134, the Accident and Health Filing Reform Act. After you review the letter and if you do not understand the content of it or the disapproval reasons, please contact the Department for further clarification.

The disapproved filing may be resubmitted within 120 days of the date of disapproval. If you choose to resubmit the filing within that time, the filing will become effective for use 30 days after receipt by the Department as provided by Section 4(C) of Act 134, unless the filing is disapproved before the 30 day period expires.

If the Department does not hear from you within 120 days, the Department will close its files on the above captioned filing. After 120 days, the Department will reopen its files and continue its review of the forms if you respond within one year of the date of this letter and furnish duplicate copies of the previously filed forms and all correspondence between you and the Department. If the filing is resubmitted after 120 days, the Department will review it as if it were a new submission under Section 4(A) of Act 134.

Please furnish the following information to the Department.

1. The 2011 filing (LFCR-127682409) for this block indicated that there were 187 policies in force. The 2016 filing (LFCR-130749493) for this block affected 164 policies. The 2021 filing (LFCR-132940309) for this block had 202 policies. Why did the number of policies affected by the 2021 increase go up from 2016?

2. Please provide a table in an Excel spreadsheet for the nationwide combined J-5762-P and J-5875-P block (perhaps similar to Exhibit F) which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the actual nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the current Pennsylvania rate level.

3. Please provide a table in an Excel spreadsheet for the nationwide combined J-5762-P and J-5875-P block (perhaps similar to Exhibit F) which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

assuming no rate increase is granted. Please restate the actual nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide.

4. Please provide the percent of active policyholders remaining in this block on a nationwide basis. How many policies were issued nationwide? How many policies remain in force nationwide?

5. Please provide the cumulative weighted average increase granted on the combined block in PA as a single number (or confirm it is 72.5%).

6. Please provide a listing of the past requested increases and approved increases by state. Also include a column showing the cumulative increases approved in each state.

7. Please provide the letter that will be sent to policyholders to inform them of the increase and their available options.

Sincerely,

James Lavery, FSA, MAAA

Actuary

Bureau of Accident & Health Insurance

Conclusion:

Sincerely,

Jim Lavery

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	10/27/2021
Submitted Date	10/27/2021

Dear Michael Hibbert,

Introduction:

Response 1

Comments:

Please see PA Response Letter 10 25 21 and John Alden PA Revised Rate Tables 20%.

Thank you.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	PA Response Letter 10 25 21
Comments:	
Attachment(s):	PA Response Letter 10 25 21.pdf

No Form Schedule items changed.

Rate/Rule Schedule Item Changes						
Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	John Alden PA Revised Rate Tables 20%	J-5762-P-PA, J-5762-P-1-PA, J-5875-P-PA, J-5875-P-PA (Q), J-5875-P-1-PA	New		John Alden PA Revised Rate Tables 20%.pdf,	10/27/2021 By: Dianne Bowdish

Conclusion:

Sincerely,
Dianne Bowdish

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	10/05/2021
Submitted Date	10/07/2021

Dear Michael Hibbert,

Introduction:

Response 1

Comments:

Please see PA Response Letter 10 05 21 and JALIC PA Objection Response Attachments 10 05 21.xlxs

Thank you.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	PA Response Letter 10 05 21
Comments:	
Attachment(s):	PA Response Letter 10 05 21.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	PA Response Letter 10 05 21
Comments:	
Attachment(s):	PA Response Letter 10 05 21.pdf

Satisfied - Item:	JALIC PA Objection Response Attachments 10 05 21
Comments:	
Attachment(s):	JALIC PA Objection Response Attachments 10 05 21.xlsx

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,

SERFF Tracking #:	LFCR-132940309	State Tracking #:	LFCR-132940309	Company Tracking #:	PA JALIC 2021 RATE INCREASE
<hr/>					
State:	Pennsylvania			Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Lifetime Independence				
Project Name/Number:	/				

Dianne Bowdish

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	09/28/2021
Submitted Date	09/28/2021

Dear Michael Hibbert,

Introduction:

Response 1

Comments:

Please see response items.

Thank you.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	JALIC PA Objection Response Attachments 08 17 21
Comments:	
Attachment(s):	JALIC PA Objection Response Attachments 08 17 21.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	JALIC PA Objection Response Attachments 08 17 21
Comments:	
Attachment(s):	JALIC PA Objection Response Attachments 08 17 21.pdf

Satisfied - Item:	PA Response Letter 08 17 21
Comments:	
Attachment(s):	PA Response Letter 08 17 21.pdf

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Supporting Document Schedule Item Changes	
Satisfied - Item:	JALIC PA Objection Response Attachments 08 17 21
Comments:	
Attachment(s):	JALIC PA Objection Response Attachments 08 17 21.pdf
Satisfied - Item:	PA Response Letter 08 17 21
Comments:	
Attachment(s):	PA Response Letter 08 17 21.pdf
Satisfied - Item:	J-NFO
Comments:	A copy of the policyholder rate increase notification letter is provided. • J-NFO.pdf is to be used for policies with a non-forfeiture rider
Attachment(s):	J-NFO.pdf
Supporting Document Schedule Item Changes	
Satisfied - Item:	JALIC PA Objection Response Attachments 08 17 21
Comments:	
Attachment(s):	JALIC PA Objection Response Attachments 08 17 21.pdf
Satisfied - Item:	PA Response Letter 08 17 21
Comments:	
Attachment(s):	PA Response Letter 08 17 21.pdf
Satisfied - Item:	J-NFO
Comments:	A copy of the policyholder rate increase notification letter is provided. • J-NFO.pdf is to be used for policies with a non-forfeiture rider
Attachment(s):	J-NFO.pdf
Satisfied - Item:	J-NPO
Comments:	A copy of the policyholder rate increase notification letter is provided. • J-NPO.pdf is to be used for policies without any non-forfeiture rider
Attachment(s):	J-NPO.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Conclusion:

Sincerely,
Dianne Bowdish

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Amendment Letter

Submitted Date: 09/28/2021

Comments:

We added JALIC PA Objection Response Attachments 08 17 21.xlsx on the Supporting Documentation tab.

Changed Items:

No Form Schedule Items Changed.

No Rate Schedule Items Changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	JALIC PA Objection Response Attachments 08 17 21.xlsx
Comments:	
Attachment(s):	JALIC PA Objection Response Attachments 08 17 21.xlsx

SERFF Tracking #:	LFCR-132940309	State Tracking #:	LFCR-132940309	Company Tracking #:	PA JALIC 2021 RATE INCREASE
State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Lifetime Independence				
Project Name/Number:	/				

Amendment Letter

Submitted Date: 08/11/2021

Comments:

Good afternoon,

We added the PA JALIC 2021 RATE INCREASE Tables & Exhibits in Excel to the Supporting Documentation tab.

Thank you

Changed Items:

No Form Schedule Items Changed.

No Rate Schedule Items Changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	John Alden Rate Increase Act Memo Attachment PA in Excel
Comments:	
Attachment(s):	John Alden Rate Increase Act Memo Attachment PA.xlsx

SERFF Tracking #: LFCR-132940309

State Tracking #: LFCR-132940309

Company Tracking #: PA JALIC 2021 RATE
INCREASE

State: Pennsylvania

Filing Company: John Alden Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Lifetime Independence

Project Name/Number: /

Note To Filer

Created By:

Jim Laverty on 08/11/2021 07:52 AM

Last Edited By:

Michael Hibbert

Submitted On:

10/28/2021 01:23 PM

Subject:

Need Excel

Comments:

Please submit the tables and exhibits found in the actuarial memo in an Excel workbook.

State: Pennsylvania

Filing Company: John Alden Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Lifetime Independence

Project Name/Number: /

Post Submission Update Request Processed On 10/28/2021

Status: Allowed

Created By: Dianne Bowdish

Processed By: Michael Hibbert

Comments:

Company Rate Information:

Company Name: John Alden Life Insurance Company

Field Name	Requested Change	Prior Value
Overall % Indicated Change	20.000%	72.800%
Overall % Rate Impact	20.000%	72.800%
Written Premium Change for this Program	\$68957	\$251004
Maximum %Change (where required)	20.000%	72.800%
Minimum %Change (where required)	20.000%	72.800%

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Rate Information

Rate data applies to filing.

Filing Method:	SERFF
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	20.000%
Effective Date of Last Rate Revision:	03/17/2017
Filing Method of Last Filing:	SERFF
SERFF Tracking Number of Last Filing:	LFCR-130749493

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
John Alden Life Insurance Company	20.000%	20.000%	\$68,957	202	\$344,785	20.000%	20.000%

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		John Alden Rate Increase Act Memo w Attachment PA	J-5762-P-PA, J-5762-P-1-PA, J-5875-P-PA, J-5875-P-PA (Q), J-5875-P-1-PA	New		John Alden Rate Increase Act Memo w Attachment PA.pdf,
2		John Alden PA Revised Rate Tables 20%	J-5762-P-PA, J-5762-P-1-PA, J-5875-P-PA, J-5875-P-PA (Q), J-5875-P-1-PA	New		John Alden PA Revised Rate Tables 20%.pdf,

John Alden Life Insurance Company

Home Office: P.O. Box 3050 Milwaukee, WI 53201-3050

Company NAIC No. 65080

Administrative Office: Post Office Box 4243

Woodland Hills, California 91365-4243

Actuarial Memorandum

August 2021

Guaranteed Renewable Long Term Nursing Care Policy	J-5762-P-PA
Guaranteed Renewable Long Term Nursing Care Policy	J-5762-P-1-PA
Guaranteed Renewable Long Term Nursing Care Policy	J-5875-P-PA
Guaranteed Renewable Long Term Nursing Care Policy	J-5875-P-PA (Q)
Guaranteed Renewable Long Term Nursing Care Policy	J-5875-P-1-PA

The above referenced individual Long Term Care (LTC) policy forms provide benefits for confinement in a qualified Nursing Facility, Assisted Living Facility, or for Home and Community Based Care. Policy forms for the John Alden product 'Independent Life Plan' are referred to as 'J-5762' or 'J-5762-P' in this memorandum. Policy forms for the John Alden product 'Lifetime Independence Plan' are referred to as 'J-5875' or 'J-5875-P' in this memorandum. Form J-5762 was issued from 1993 to 1996, and Form J-5875 was issued from 1996 to 2000 in Pennsylvania. These policy forms are no longer being marketed in any state.

1. Purpose of Filing

This is a rate increase filing for existing Long-Term Care policy forms. This actuarial memorandum has been prepared for the purpose of demonstrating that the requested rate increase meets the minimum requirements of the 2014 National Association of Insurance Commissioners (NAIC) Long-Term Care Insurance Model Regulation and the applicable regulatory requirements of this jurisdiction. It may not be suitable for other purposes.

2. Scope of Filing

This filing applies to the Company's LTC policy forms as specified above. These forms provide daily benefits for qualified long-term care services in various settings, as summarized in Exhibit A, when the insured meets policy benefit qualification requirements.

The forms included in this filing are individual LTC policies that are guaranteed renewable for life, subject to the Company's right to change premium rates.

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These policy forms were issue age rated and fully underwritten. The issue ages were from 40 to 84 on an age nearest birthday basis, except for endorsed groups where the issue age range was 18 to 84 in some jurisdictions. Strict underwriting criteria were administered with the use of various underwriting tools in addition to the application, which may have included medical records, an attending physician's statement, telephone interview and/or face-to-face assessment.

These policy forms were marketed by individual agents who primarily sell on an individual basis.

The proposed rate increase applies to all inforce policies as these forms are no longer being marketed. Paid-up policies will not receive a rate increase.

The number of policyholders and the annual inforce premium, as of December 2020, is displayed in Exhibit A1. The exhibit also shows the average annual premium before and after the proposed rate increase.

3. Reason for the Increase

A rate increase is necessary at this time due to significantly higher anticipated future and lifetime loss ratios. The higher loss ratios result from a combination of lower lapse, lower death, longer claim continuance, and lower investment earnings on the assets.

John Alden Life has been evaluating this block and updating assumptions based on the actual experience as well as the industry experience. For the policy forms specified above, the projected experience is now worse than what original pricing assumptions were projecting. The combined effect of updating the lapse, mortality, and morbidity assumptions to better reflect the actual experience, as well as industry data, resulted in the need for a rate increase.

The current premium levels are inadequate. Therefore, the Company is requesting a rate increase to help alleviate the adverse performance on this block of business.

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4. Requested Rate Increase

The Company is requesting the approval of the following increases:

J-5762 & J-5875: Three-year phase-in flat increase of 20% each year on the current base rates; this is a cumulative 72.8% increase on the current base rates.

The increase does not vary by issue age or other policy characteristics. The new premium for any contract is equal to the product of the contract's current premium and one plus the base premium increase percentage. Paid-up policies will not be affected by the rate increase.

Please see Exhibits B1 & B2 for rate tables reflecting the rate increase:

Exhibit B1: J-5762 proposed rates

Exhibit B2: J-5875 proposed rates

Please note that the actual rates implemented may vary slightly from those in the rate pages due to implementation rounding algorithms.

5. History of Previous Rate Revisions

a. J-5762

An average increase of 25% was approved on 5/6/2008.

A flat increase of 15% was approved on 12/15/2011.

A flat increase of 20% was approved on 12/14/2016.

b. J-5875

An average increase of 25% was approved on 5/6/2008.

A flat increase of 15% was approved on 12/15/2011.

A flat increase of 20% was approved on 12/14/2016.

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their claims are incurred, grading down from 36.05% of all claims at age 40, to 6.38% at age 80, and then 0% at age 120. Utilization factors are then applied to the claim costs, which are as follows: 68% for COLA reimbursement policies and 86% for non-COLA reimbursement policies. No underwriting selection durational factors or morbidity improvements are assumed in the projection.

Policy design features have been taken into consideration. Benefit provisions, elimination periods, benefit periods, number of units, benefit growth, etc. have been accounted for either in the development of claim costs or projection model formulas.

Exhibit E1 shows the best estimate incidence rates by gender and marital status. Exhibit E2 demonstrates the best estimate lengths of stay for lifetime benefit period, 90-day elimination period policies with and without 5% Compound COLA.

Exhibits E3 and E4 contain the analysis of actual to expected incidence and termination respectively, with expected based on best estimate assumptions, for the combined reinsurer LTC blocks.

e. Expenses

Expenses have not been explicitly projected. It is assumed that the originally filed expense assumptions remain appropriate.

f. Rate Increase Impact on Policyholder Behavior

At the time of a rate increase, policyholders have the option to elect a Contingent Benefit Upon Lapse (CBUL) or reduced benefit options (RBO). An increase in morbidity for adverse selection due to the rate increase is also assumed based on the percentage of policyholders that elect CBUL and RBO.

Policyholders who elect a CBUL are modeled as a shock lapse. The shock lapse assumption represents policyholders who are assumed to drop their policies instead of accepting a rate increase. The RBO assumption represents policyholders who are assumed to choose to reduce benefits in order to offset all or some of the rate increase. The adverse selection associated with the requested increase is a function of CBUL and RBO election. The reasoning for a permanent shift in morbidity due to adverse selection is that the insureds remaining after the increase are those who choose to accept the rate increase (i.e., the insureds who think they will use the policy) and are a less healthy population (will use more benefits) than the pre-filing cohort. For those who lapse the policy, the assumption is that the insureds are healthier and less likely to need the policy as they do not value the policy enough to pay a higher premium.

The following provides approximate averages for these assumptions: 3% shock lapse, 11% RBO election

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rate, and 2% morbidity increase due to adverse selection.

The projections in Exhibits F and G assume the 1st, 2nd, and 3rd phase increases are expected to occur in 2022, 2023, and 2024, respectively.

The above assumptions are based on the experience of policies issued by the Company, reinsurer and industry experience, and actuarial judgment. The best estimate assumptions reflect an estimate of the most likely outcome and do not reflect an explicit margin for conservatism.

7. Area Factors and Trend Assumptions

Area factors were not used in pricing for the above-listed policy forms. As this is not medical insurance, an explicit medical cost trend is not included in the projections.

8. Reserves

Active life reserves have not been used in this rate increase analysis. Claim reserves as of December 31, 2020 have been discounted to the incurral date of each respective claim and included in historical incurred claims. Incurred but not reported reserve (IBNR) balances as of December 31, 2020 have been allocated to a calendar year of incurral and included in historical incurred claims. Paid claims have been discounted to the incurral date and included in historical incurred claims. Claim reserves are calculated for active and pending claimants as the present value of benefit payments discounted by interest and terminations. The IBNR is based on lag factors which are applied to the claim reserves and survivor payments based on the difference between the incurral date and the valuation date.

9. Past and Future Policy Experience

Earned premiums and incurred claims for projection years 2021 through 2060 are developed from an active lives model representing actual contracts in force as of December 31, 2020. The best estimate assumptions described above for morbidity, voluntary lapse, and mortality are used to project earned premiums and incurred claims.

Nationwide and statewide historical experience and projections before and after the proposed rate increase are

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shown as follows:

Policy Form	Nationwide	Pennsylvania
J-5762	Exhibit F1	Exhibit G1
J-5875	Exhibit F2	Exhibit G2
Combined	Exhibit F	Exhibit G

Historical experience is shown by claim incurral year with the loss ratio for each loss year calculated by the following formula:

$$LR_j = \frac{\sum_{t=j}^{2020} Pmt_t^j \times v^{t-j} + {}_jCR_{2020} \times v^{2020-j+0.5} + {}_jIBNR_{2020} \times v^{2020-j+0.5}}{EP_j}$$

LR_j = loss ratio for year j

Pmt_t^j = claim payments in year t on claims incurred in year j , assumed to occur midyear

${}_jCR_{2020}$ = claim reserve held on December 31, 2020 for claims incurred in year j

${}_jIBNR_{2020}$ = incurred but not reported reserve as of December 31, 2020 attributable to claims incurred in year j

EP_j = earned premium in year j , assumed mid-year

j = year of incurral

- **J-5762:** $v = 1 / 1.047 = 0.955110$
- **J-5875:** $v = 1 / 1.045 = 0.956938$

Future anticipated loss ratio is calculated, with and without interest, as anticipated incurred claims divided by earned premiums. The lifetime loss ratio as of December 31, 2020 is calculated as the sum of accumulated past experience and discounted future experience where accumulation and discounting occur at the maximum valuation interest rate.

10. Analysis Performed

The originally approved premium schedule was based on pricing assumptions believed to be appropriate, given industry experience available when the originally approved rate schedule was developed. The original pricing assumptions for voluntary lapse, mortality, and claim costs were as follows:

a. Original Pricing Ultimate Lapse

J-5762: 5.0%

J-5875: 7.5%

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b. Original Pricing Mortality

J-5762 & J-5875: 1975-80 Select and Ultimate

c. Original Pricing Morbidity

Original pricing claim costs for skilled, intermediate, and Facility Care Benefits are derived from The Reports of the Society of Actuaries based on the 1985 National Nursing Home Survey Utilization Data in Transactions, Society of Actuaries, 1988-89-90 Reports; and the Long Term Care Intercompany Study: 1984-1991 Experience in Transactions, Society of Actuaries, 1993-94 Reports. Claim costs factors shown in the original actuarial memorandum are applied to the inforce lives and represent the expected cost per life of incurred benefits.

Joint claim cost factors:

J-5762 & J-5875: 150% of the claim costs of the older insured

Underwriting selection factors:

J-5762: 20%, 40%, 60%, 80%, 100% durations 5 & later

J-5875: 10%, 20%, 40%, 60%, 80%, 100% durations 6 & later

d. Original Pricing Interest

J-5762 & J-5875: 7%

As part of the inforce management of the business, the reinsurer and administrator of the business monitor the performance of the business by completing periodic actual-to-expected analysis for voluntary lapse, mortality, claim incidence, and claim termination. The findings from these analyses were used in projecting the inforce business to determine the effect of experience on the projected lifetime loss ratio. An analysis of the projected lifetime loss ratio based on current best estimate assumptions compared to that assumed at the time of original pricing revealed that experience had deteriorated significantly.

The best estimate assumptions used in this filing (described in Section 6) are based on actual inforce experience of the Company, experience of the reinsurer's similarly underwritten and administered LTC products, industry experience, and actuarial judgment. Actual persistency and claim continuance have been higher than what were assumed in the original pricing.

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11. Loss Ratio Requirement Compliance Demonstration

Nationwide Exhibits F, F1, and F2, and Statewide Exhibits G, G1, and G2, show actual and projected experience using current best estimate assumptions. Actual experience is provided from inception through 2020 and then projected on a seriatim basis for 40 years using the current assumptions described above in Section 6. Included in Exhibits F, F1, F2, G, G1, and G2 are calendar year earned premiums, incurred claims, annual loss ratios, and cumulative loss ratios. As shown in Exhibits F, F1, F2, G, G1, and G2, the anticipated lifetime loss ratios with the requested rate increase exceed the minimum loss ratio required by pre-rate stability regulation.

12. Proposed Effective Date

The rate increase will apply to policies on their policy anniversary date following at least a 60-day policyholder notification period after approval.

13. Nationwide Distribution of Business as of December 31, 2020

As of December 31, 2020, the number of policies in force that will be affected by this increase by policy form is shown in the following Exhibits:

Policy Form	Nationwide	Pennsylvania
J-5762	Exhibit H1	Exhibit H3
J-5875	Exhibit H2	Exhibit H4

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14. Actuarial Certification

I am a Fellow of the Society of Actuaries and a Member of the American Academy of Actuaries; I meet the Academy's qualification standards for preparing health rate filings and am familiar with the requirements for filing long-term care insurance premium rate increases.

This memorandum has been prepared in conformity with all applicable Actuarial Standards of Practice, including ASOP No. 8 and No. 18.

The data used to develop this actuarial memorandum was provided by LifeCare Assurance Company, the administrator of the policies. I have reviewed the data for reasonableness.

To the best of my knowledge and judgment, I hereby certify that:

- this rate submission is in compliance with the applicable laws and regulations of the jurisdiction where it is filed;
- policy design, underwriting, and claims adjudication practices have been taken into consideration;
- the rates are not excessive or unfairly discriminatory and bear a reasonable relationship to the benefits based on the loss ratio standards of this jurisdiction;
- this filing will enhance premium adequacy, but not enough to prevent future rate actions. However, if the requested rate increase is approved in full, the company will not file for a future rate increase that would result in a combined nationwide lifetime loss ratio less than 115%; and
- the relationship between renewal premium rate schedules and new business premium rate schedules is not applicable because the company is no longer marketing new business in any state.



Phillip Oh, FSA, MAAA
Consulting Actuary

Date: August 3, 2021

John Alden Life Insurance Company
Policy Forms: J-5762-P & J-5875-P

Exhibit A: Benefit Summary
(Does not reflect state variations)

General Information	J-5762	J-5875
Available Coverage	Nursing Care or Home Health Care	Nursing Care or Home Health Care
Benefit Trigger	Medical Necessity, 2 of 5 ADL's, or Severe Cognitive Impairment	Medical Necessity, 2 of 5 ADL's, or Severe Cognitive Impairment
Benefit Pool	Yes	Yes
Underwriting classes	Preferred, Standard, Substandard1, Substandard2	Accept, Standard, Substandard
Employer/Association Group Discount	10% for all ages	15% for ages 40-64 10% for ages 65+
Available Issue Ages	40 – 84 (age nearest birthday) 18 – 84 (age nearest, endorsed groups)	40 – 84 (age nearest birthday) 18 – 84 (age nearest, endorsed groups)
Maximum Daily Benefit Amount	\$10 to \$200 (\$10 increments)	\$20 to \$250 (\$10 increments)
Benefit Period	3 yrs, Lifetime	2 yrs, 3 yrs, 4 yrs, Lifetime
Payment Options	Lifetime	Lifetime, 10-year pay
Elimination period	0, 30, 90, 180 days	0, 30, 90, 180 days
Bed Reservation Benefit	N/A	\$10 per day, up to 14 days per calendar year, when insured incurs charges to reserve a bed in a Long Term Care Facility during hospitalization.
Alternative Plan of Care	N/A	Alternate Plan of Care Benefit provides medical or non-medical benefits agreed upon by insured, Physician, and the Company which may enable the insured to end Long Term Care Facility confinement and recover at home or in an alternative facility.
Waiver of Premium Benefit	Waiver of Premium Benefit is provided after confinement in a Long Term Care Facility for a period of 90 consecutive days.	Waiver of Premium Benefit is provided after confinement in a Long Term Care Facility for a period of 90 consecutive days.
Personal Care Advisor	N/A	Personal Care Advisor, accessible through toll-free telephone number, is assigned to insured upon claim to provide assistance with any questions.
Renewability	Guaranteed renewable for life	Guaranteed renewable for life

Riders/Endorsements	Description	J-5762	J-5875
5% Simple Inflation	This rider increases the original daily benefit amount by 5% annually. Increases are made regardless of claims status.	Available (Only in Georgia)	Available
5% Compound Inflation	This rider increases the daily benefit amount by 5%, compounded annually. Increases are made regardless of claims status.	Available	Available
Home Health Care Rider	\$5.00 per day or \$10.00 per day of Home Health Care Benefit payable after an elimination period of 0, 30, 90, or 180 days. An Alternative Plan of Care is also available if insured is otherwise qualified for benefits under the policy or rider. Under joint coverage this benefit is payable to either or both insureds, if qualified.	Available	Not Available
Full Survivor Benefit and Continuation of Coverage Rider	A Full Survivor Benefit equal to the total of all premiums paid is payable to the beneficiary upon the death of the insured (second to die in the case of joint coverage). A Continuation of Coverage Benefit is payable in the event the policy lapses for nonpayment of premiums. This benefit is equal to the total of premiums paid less claims paid.	Available	Not Available
Limited Survivor Benefit and Continuation of Coverage Rider	A Limited Survivor Benefit equal to the total of all premiums paid less claims paid is payable to the beneficiary upon the death of the insured (second to die in the case of joint coverage). A Continuation of Coverage Benefit is payable in the event the policy lapses for nonpayment of premiums. This benefit is equal to the total of premiums paid less claims paid.	Available	Not Available
Limited Nonforfeiture Benefits Rider	A Limited Nonforfeiture Benefit equal to the total of all premiums paid less claims paid is payable to the beneficiary upon the death of the insured (second to die in the case of joint coverage). A Continuation of Coverage Benefit is payable in the event the policy lapses for nonpayment of premiums. This benefit is equal to the total of premiums paid less claims paid. A limited Survivor Benefit equal to the total of all premiums paid less claims paid is payable to the beneficiary upon the death of the insured (second to die in the case of joint coverage).	Available	Not Available
Optional Cash Nonforfeiture Benefits Option Rider	Provides the same benefits as the Limited Nonforfeiture Benefits Rider for Guaranteed Assistance Care and Continuation of Coverage, plus the following: A Full Survivor Benefit equal to the total of all premiums paid is payable upon the death of the insured (second to die in the case of joint coverage). A Cash Nonforfeiture Benefit is available upon surrender of the rider. The Cash Nonforfeiture Benefit is equal to a percentage of the difference between the first year annual premium and the annual renewal premium.	Available	Not Available
Home and Community Based Care Reimbursement Benefit Rider	This rider pays 100% of actual expenses incurred up to the maximum daily benefit chosen for services provided by a licensed professional nurse or therapist. 80% of actual expenses incurred up to maximum daily benefit chosen is paid for adult day care, confinement in a qualified Assisted Living Facility, homemaker services, services provided by a qualified Home Care Agency and respite care (maximum of 21 days per calendar year). Premiums are waived after 90 consecutive days of confinement in an Assisted Living Facility. Benefits are payable after the elimination period. The insured may choose a maximum daily benefit between 50% and 100% of the daily benefit for Long Term Nursing Care and may also choose a benefit period less than or equal to the benefit period for Long Term Nursing Care.	Not Available	Available
Home and Community Based Care Indemnity Benefit Rider	This rider pays the full daily benefit amount chosen for the same care and services described under the Reimbursement Benefit Rider. Benefits are payable after the elimination period. The insured may choose a daily benefit between 50% and 100% of the daily benefit for Long Term Nursing Care and may also choose benefit period less than or equal to the benefit period for Long Term Nursing Care.	Not Available	Available
Assisted Living Facility Benefit Rider	After satisfaction of the elimination period, this rider pays 70% of the Long Term Nursing Care daily benefit for confinement in a qualified Assisted Living Facility. Premiums are waived after 90 consecutive days of confinement in such a facility. This rider is not available if either one of the Home and Community Based Care Benefit Riders is purchased.	Not Available	Available
Shortened Benefit Period Nonforfeiture Rider	This rider provides the nonforfeiture credit as proposed for adoption by the NAIC. If the policy has been in force for at least three years and lapses due to nonpayment of premiums, coverage will continue and benefits will be payable at the daily benefit amount in effect on the date of lapse. The minimum benefit payable under the rider will be at least 30 times the daily benefit amount in effect on the date of lapse. Any Cost of Living Rider attached to the policy will terminate with the lapse of the policy and the benefit payable under this rider will be the daily benefit in effect on the date of lapse.	Not Available	Available
Full Continuation of Coverage Benefit Rider	This rider provides a nonforfeiture benefit without a claims offset in the event of policy lapse. If the policy lapses due to nonpayment of premium, coverage will continue and benefits will be payable at the daily benefit amount in effect on the date of lapse. The number of days remaining for which benefits are payable after lapse is equal to the total of premiums paid divided by the daily benefit amount on the date of lapse. Any premiums paid which are not paid in benefits as continued coverage will be paid to the beneficiary upon the insured's death. If the policy lapses due to death of the insured and has not previously lapsed for nonpayment of premium, the total of premiums paid, with no deduction for benefits paid, will be paid to the beneficiary. Under joint coverage, benefits payable upon death will be paid upon the last to die.	Not Available	Available
Limited Continuation of Coverage Benefit Rider	This rider provides a nonforfeiture benefit with a claims offset in the event of policy lapse. The same benefit is provided for continued coverage after lapse due to nonpayment of premium as under the Full Continuation of Coverage Benefit Rider described above. If the policy lapses due to death of the insured and has not previously lapsed for nonpayment of premium, the total of premiums paid, reduced by the total of benefits received, will be paid to the beneficiary. Under joint coverage, benefits payable upon death will be paid upon the last to die.	Not Available	Available
10- Year Premium Payment Endorsement	Premiums payable over a 10 year period, after which no further premium is due.	Not Available	Available

John Alden Life Insurance Company
Rate Increase Impact Exhibit
Attachment A1

Nationwide				
	Cost of Living Adjustment			Total
	None	Compound	Simple	
	J-5762-P			
Number of Policies	494	684	20	1,198
Current Premium	\$729,341	\$1,398,200	\$27,314	2,154,855
Current AveragePremium	\$1,476	\$2,044	\$1,366	1,799
New Premium	\$1,260,301	\$2,416,089	\$47,199	3,723,589
New Average Premium	\$2,551	\$3,532	\$2,360	3,108
Average Rate Increase	72.80%	72.80%	72.80%	72.80%
	J-5875-P			
Number of Policies	781	1,199	1,121	3,101
Current Premium	\$1,230,728	\$2,681,621	\$2,482,639	6,394,988
Current AveragePremium	\$1,576	\$2,237	\$2,215	2,062
New Premium	\$2,126,699	\$4,633,842	\$4,290,000	11,050,540
New Average Premium	\$2,723	\$3,865	\$3,827	3,564
Average Rate Increase	72.80%	72.80%	72.80%	72.80%
	Combined			
Number of Policies	1,275	1,883	1,141	4,299
Current Premium	\$1,960,069	\$4,079,821	\$2,509,953	8,549,843
Current AveragePremium	\$1,537	\$2,167	\$2,200	1,989
New Premium	\$3,386,999	\$7,049,930	\$4,337,199	14,774,129
New Average Premium	\$2,656	\$3,744	\$3,801	3,437
Average Rate Increase	72.80%	72.80%	72.80%	72.80%

Pennsylvania				
	Cost of Living Adjustment			Total
	None	Compound	Simple	
	J-5762-P			
Number of Policies	15	10	0	25
Current Premium	\$24,499	\$22,825	\$0	47,323
Current AveragePremium	\$1,633	\$2,282	\$0	1,893
New Premium	\$42,333	\$39,441	\$0	81,775
New Average Premium	\$2,822	\$3,944	\$0	3,271
Average Rate Increase	72.80%	72.80%	0.00%	72.80%
	J-5875-P			
Number of Policies	26	35	58	119
Current Premium	\$53,458	\$95,640	\$148,364	297,462
Current AveragePremium	\$2,056	\$2,733	\$2,558	2,500
New Premium	\$92,375	\$165,266	\$256,373	514,014
New Average Premium	\$3,553	\$4,722	\$4,420	4,319
Average Rate Increase	72.80%	72.80%	72.80%	72.80%
	Combined			
Number of Policies	41	45	58	144
Current Premium	\$77,956	\$118,465	\$148,364	344,785
Current AveragePremium	\$1,901	\$2,633	\$2,558	2,394
New Premium	\$134,709	\$204,707	\$256,373	595,789
New Average Premium	\$3,286	\$4,549	\$4,420	4,137
Average Rate Increase	72.80%	72.80%	72.80%	72.80%

John Alden Life Insurance Company

Policy Form: J-5762-P

Exhibit B1

Rates and Factors After Proposed Increase (3 Phases of 20% Each)

Individual / Standard Risk / Lifetime Benefit Period / 90 Day Elimination Period

Issue Age	LTNC Level Premium Per \$10 Daily Benefit			Benefit Increase Factors Compound	Other Riders	
	1st Phase	2nd Phase	3rd Phase		Limited SB/COC	Full SB/COC
40	49.68	59.61	71.53	2.45	1.20	1.260
41	52.17	62.60	75.12	2.45	1.21	1.273
42	54.64	65.56	78.67	2.45	1.22	1.286
43	57.13	68.55	82.26	2.45	1.23	1.299
44	59.61	71.53	85.83	2.45	1.24	1.312
45	62.10	74.52	89.42	2.45	1.25	1.325
46	64.58	77.49	92.98	2.45	1.26	1.338
47	67.07	80.48	96.57	2.45	1.27	1.351
48	69.55	83.46	100.15	2.45	1.28	1.364
49	72.04	86.44	103.72	2.45	1.29	1.377
50	74.52	89.42	107.30	2.45	1.30	1.390
51	78.24	93.88	112.65	2.40	1.31	1.403
52	81.97	98.36	118.03	2.35	1.32	1.416
53	85.69	102.82	123.38	2.30	1.33	1.429
54	89.42	107.30	128.76	2.25	1.34	1.442
55	93.15	111.78	134.13	2.20	1.35	1.455
56	100.59	120.70	144.84	2.16	1.36	1.468
57	108.05	129.66	155.59	2.12	1.37	1.481
58	115.50	138.60	166.32	2.08	1.38	1.494
59	122.96	147.55	177.06	2.04	1.39	1.507
60	130.40	156.48	187.77	2.00	1.40	1.520
61	145.31	174.37	209.24	1.96	1.41	1.533
62	160.21	192.25	230.70	1.92	1.42	1.546
63	175.11	210.13	252.15	1.88	1.43	1.559
64	190.02	228.02	273.62	1.84	1.44	1.572
65	204.92	245.90	295.08	1.80	1.45	1.585
66	238.46	286.15	343.38	1.77	1.46	1.598
67	272.00	326.40	391.68	1.74	1.47	1.611
68	305.53	366.63	439.95	1.71	1.48	1.624
69	339.06	406.87	488.24	1.68	1.49	1.637
70	372.60	447.12	536.54	1.65	1.50	1.650
71	440.91	529.09	634.90	1.62	1.51	1.663
72	509.22	611.06	733.27	1.59	1.52	1.676
73	577.52	693.02	831.62	1.56	1.53	1.689
74	645.84	775.00	930.00	1.53	1.54	1.702
75	714.15	856.98	1,028.37	1.50	1.55	1.715
76	807.30	968.76	1,162.51	1.47	1.56	1.728
77	900.44	1,080.52	1,296.62	1.44	1.57	1.741
78	993.60	1,192.32	1,430.78	1.41	1.58	1.754
79	1,086.75	1,304.10	1,564.92	1.38	1.59	1.767
80	1,179.90	1,415.88	1,699.05	1.35	1.60	1.780
81	1,266.84	1,520.20	1,824.24	1.32	1.61	1.793
82	1,353.78	1,624.53	1,949.43	1.29	1.62	1.806
83	1,440.72	1,728.86	2,074.63	1.26	1.63	1.819
84	1,527.66	1,833.19	2,199.82	1.23	1.64	1.832
Issue Age Independent Factors						
Risk Classes		Elimination Period		Payment Mode		
Preferred	0.70	0-Day	1.50	Annual	1.00	
Standard	1.00	30-Day	1.30	Semi-Annual	0.52	
Substandard1	1.25	90-Day	1.00	Quarterly	0.27	
Substandard2	1.50	180-Day	0.80	Monthly	0.10	
Non-level Premium Factor		HHC Benefit Rider Elimination & Premium Factor		Other Factors		
First Year	2.000	0 Visits (50%)	0.75	Joint Factor	1.50	
Renewal Years	0.667	0 Visits (100%)	1.50	3-Yr Benefit Period	0.70	
		30 Visits (50%)	0.65	Group Discount	0.10	
		30 Visits (100%)	1.30	First Day of Coverage	1.25	

John Alden Life Insurance Company
Policy Form: J-5875-P
Exhibit B2
Rates and Factors After Proposed Increase (3 Phases of 20% Each)
Individual / Standard Risk / Lifetime Benefit Period / 90 Day Elimination Period

Issue Age	LTNC Level Premium Per \$10 Daily Benefit			HCBC Reimbursement Premium			HCBC Indemnity Premium			Benefit Increase Factors		Other Riders			
	1st Phase	2nd Phase	3rd Phase	1st Phase	2nd Phase	3rd Phase	1st Phase	2nd Phase	3rd Phase	Compound	Simple	10-Pay Factor	Limited COC Factor	Full COC Factor	SBP Factor
40	43.47	52.16	62.59	34.77	41.72	50.06	43.47	52.16	62.59	2.45	1.80	1.90	1.244	1.330	1.122
41	45.63	54.75	65.70	36.51	43.81	52.57	45.63	54.75	65.70	2.45	1.80	1.89	1.252	1.340	1.126
42	47.82	57.38	68.85	38.26	45.91	55.09	47.82	57.38	68.85	2.45	1.80	1.88	1.259	1.350	1.130
43	49.99	59.98	71.97	39.98	47.97	57.56	49.99	59.98	71.97	2.45	1.80	1.87	1.267	1.360	1.134
44	52.17	62.60	75.12	41.73	50.07	60.08	52.17	62.60	75.12	2.45	1.80	1.86	1.274	1.370	1.137
45	54.33	65.19	78.22	43.47	52.16	62.59	54.33	65.19	78.22	2.45	1.80	1.85	1.281	1.380	1.141
46	56.52	67.82	81.38	45.21	54.25	65.10	56.52	67.82	81.38	2.45	1.80	1.84	1.289	1.390	1.145
47	58.69	70.42	84.50	46.94	56.32	67.58	58.69	70.42	84.50	2.45	1.80	1.83	1.296	1.400	1.148
48	60.85	73.02	87.62	48.68	58.41	70.09	60.85	73.02	87.62	2.45	1.80	1.82	1.304	1.410	1.152
49	63.02	75.62	90.74	50.42	60.50	72.60	63.02	75.62	90.74	2.45	1.80	1.81	1.311	1.420	1.156
50	65.21	78.25	93.90	52.17	62.60	75.12	65.21	78.25	93.90	2.45	1.80	1.80	1.319	1.430	1.160
51	68.47	82.16	98.59	54.77	65.72	78.86	68.47	82.16	98.59	2.40	1.78	1.79	1.326	1.440	1.163
52	71.72	86.06	103.27	57.38	68.85	82.62	71.72	86.06	103.27	2.35	1.76	1.78	1.333	1.450	1.167
53	74.99	89.98	107.97	60.00	72.00	86.40	74.99	89.98	107.97	2.30	1.74	1.77	1.344	1.465	1.172
54	78.24	93.88	112.65	62.59	75.10	90.12	78.24	93.88	112.65	2.25	1.72	1.76	1.356	1.480	1.178
55	81.51	97.81	117.37	65.21	78.25	93.90	81.51	97.81	117.37	2.20	1.70	1.75	1.367	1.495	1.184
56	88.02	105.62	126.74	70.43	84.51	101.41	88.02	105.62	126.74	2.16	1.68	1.73	1.378	1.510	1.189
57	94.56	113.47	136.16	75.64	90.76	108.91	94.56	113.47	136.16	2.12	1.66	1.71	1.389	1.525	1.195
58	101.08	121.29	145.54	80.87	97.04	116.44	101.08	121.29	145.54	2.08	1.64	1.69	1.400	1.540	1.200
59	107.61	129.13	154.95	86.08	103.29	123.94	107.61	129.13	154.95	2.04	1.62	1.67	1.411	1.555	1.206
60	114.12	136.94	164.32	91.29	109.54	131.44	114.12	136.94	164.32	2.00	1.60	1.65	1.422	1.570	1.211
61	129.71	155.65	186.78	103.76	124.51	149.41	129.71	155.65	186.78	1.96	1.58	1.63	1.433	1.585	1.217
62	145.31	174.37	209.24	116.25	139.50	167.40	145.31	174.37	209.24	1.92	1.56	1.61	1.444	1.600	1.222
63	160.93	193.11	231.73	128.75	154.50	185.40	160.93	193.11	231.73	1.88	1.54	1.59	1.467	1.630	1.234
64	176.52	211.82	254.18	141.22	169.46	203.35	176.52	211.82	254.18	1.84	1.52	1.57	1.489	1.660	1.245
65	192.11	230.53	276.63	153.69	184.42	221.30	192.11	230.53	276.63	1.80	1.50	1.55	1.511	1.690	1.256
66	218.90	262.68	315.21	175.11	210.13	252.15	218.90	262.68	315.21	1.77	1.48	1.53	1.533	1.720	1.267
67	245.67	294.80	353.76	196.54	235.84	283.00	245.67	294.80	353.76	1.74	1.46	1.51	1.556	1.750	1.278
68	272.46	326.95	392.34	217.97	261.56	313.87	272.46	326.95	392.34	1.71	1.44	1.49	1.578	1.780	1.289
69	299.24	359.08	430.89	239.38	287.25	344.70	299.24	359.08	430.89	1.68	1.42	1.47	1.600	1.810	1.300
70	326.03	391.23	469.47	260.82	312.98	375.57	326.03	391.23	469.47	1.65	1.40	1.45	1.622	1.840	1.311
71	376.87	452.24	542.68	301.49	361.78	434.13	376.87	452.24	542.68	1.62	1.38	1.43	1.644	1.870	1.322
72	427.70	513.24	615.88	342.17	410.60	492.72	427.70	513.24	615.88	1.59	1.36	1.41	1.667	1.900	1.334
73	478.56	574.27	689.12	382.85	459.42	551.30	478.56	574.27	689.12	1.56	1.34	1.39	1.681	1.920	1.341
74	529.40	635.28	762.33	423.51	508.21	609.85	529.40	635.28	762.33	1.53	1.32	1.37	1.696	1.940	1.348
75	580.24	696.28	835.53	464.19	557.02	668.42	580.24	696.28	835.53	1.50	1.30	1.35	1.711	1.960	1.356
76	670.68	804.81	965.77	536.54	643.84	772.60	670.68	804.81	965.77	1.47	1.28	1.33	1.726	1.980	1.363
77	761.11	913.33	1,095.99	608.88	730.65	876.78	761.11	913.33	1,095.99	1.44	1.26	1.31	1.741	2.000	1.371
78	851.52	1,021.82	1,226.18	681.22	817.46	980.95	851.52	1,021.82	1,226.18	1.41	1.24	1.29	1.748	2.010	1.374
79	941.97	1,130.36	1,356.43	753.58	904.29	1,085.14	941.97	1,130.36	1,356.43	1.38	1.22	1.27	1.756	2.020	1.378
80	1,032.42	1,238.90	1,486.68	825.92	991.10	1,189.32	1,032.42	1,238.90	1,486.68	1.35	1.20	1.25	1.763	2.030	1.382
81	1,122.85	1,347.42	1,616.90	898.28	1,077.93	1,293.51	1,122.85	1,347.42	1,616.90	1.32	1.19	1.23	1.770	2.040	1.385
82	1,213.27	1,455.92	1,747.10	970.61	1,164.73	1,397.67	1,213.27	1,455.92	1,747.10	1.29	1.18	1.21	1.778	2.050	1.389
83	1,303.70	1,564.44	1,877.32	1,042.96	1,251.55	1,501.86	1,303.70	1,564.44	1,877.32	1.26	1.17	1.19	1.785	2.060	1.393
84	1,394.15	1,672.98	2,007.57	1,115.32	1,338.38	1,606.05	1,394.15	1,672.98	2,007.57	1.23	1.16	1.17	1.793	2.070	1.397
Issue Age Independent Factors															
Risk Classes		Elimination Period		Payment Mode		Benefit Period		Other Factors							
Accept	0.80	0-Day	1.30	Annual	1.00	2-Year	0.60	Joint Factor	1.50						
Standard	1.00	30-Day	1.15	Semi-Annual	0.52	3-Year	0.70	ALF Benefit Rider	1.14						
Substandard	1.20	90-Day	1.00	Quarterly	0.27	4-Year	0.80								
Non-level Premium Factor		Endorsed Group Discount													
First Year	2.00	Ages 40-64	0.15												
Renewal Years	0.75	Ages 65+	0.10												

John Alden Life Insurance Company
Combined Reinsurer Experience
Exhibit C
Lapse Actual to Expected (Best Estimate) Analysis

Duration	Exposure*	Lapses	Actual Lapse Rates	Best Estimate Lapse Rates	A/E
20	34,751	253	0.73%	0.75%	0.97
21	27,299	201	0.74%	0.75%	0.98
22	18,674	118	0.63%	0.75%	0.84
23	11,840	85	0.72%	0.75%	0.96
24	6,834	53	0.78%	0.75%	1.03
25	3,461	23	0.66%	0.75%	0.89
26	1,537	9	0.59%	0.75%	0.78
27	601	6	1.00%	0.75%	1.33
28	296	1	0.34%	0.75%	0.45
29	109	0	0.00%	0.75%	0.00
30	30	0	0.00%	0.75%	0.00
31	7	0	0.00%	0.75%	0.00
Average	105,440	749	0.71%	0.75%	0.95

*All J-5762-P and J-5875-P policies are duration 20+

* Lifetime pay policies only

John Alden Life Insurance Company
Policy Forms: J-5762-P & J-5875-P
Exhibit D1
Mortality Selection Factors

Policy Duration	Selection Factors	
	Single	Joint
1	0.165	0.095
2	0.335	0.135
3	0.390	0.225
4	0.425	0.240
5	0.470	0.280
6	0.485	0.320
7	0.520	0.330
8	0.530	0.370
9	0.600	0.380
10	0.610	0.390
11	0.630	0.410
12	0.670	0.435
13	0.680	0.455
14	0.760	0.490
15	0.800	0.500
16	0.850	0.520
17	0.875	0.590
18	0.925	0.610
19	0.930	0.650
20	0.940	0.680
21	1.000	0.820
22	1.000	0.830
23	1.000	0.930
24	1.000	0.960
25	1.000	1.000

John Alden Life Insurance Company
Combined Reinsurer Experience
Exhibit D2
Mortality A to E Analysis

Attained Age	Single Lives Death Counts			Joint Lives Death Counts**			Total Death Counts		
	Actual	Expected*	A/E	Actual	Expected*	A/E	Actual	Expected*	A/E
<40	1	1	78%	1	2	59%	2	3	68%
40-44	2	4	56%	14	7	201%	16	11	152%
45-49	27	14	192%	55	29	192%	82	43	192%
50-54	67	56	120%	160	114	141%	227	170	134%
55-59	190	196	97%	538	408	132%	728	604	120%
60-64	483	589	82%	1,244	1,219	102%	1,727	1,808	96%
65-69	940	1,288	73%	2,105	2,584	81%	3,045	3,871	79%
70-74	1,608	1,919	84%	3,328	3,733	89%	4,936	5,651	87%
75-79	2,137	2,445	87%	4,216	4,378	96%	6,353	6,823	93%
80-84	2,700	2,639	102%	4,313	4,114	105%	7,013	6,753	104%
85-89	2,302	2,204	104%	3,074	2,607	118%	5,376	4,811	112%
90+	1,798	1,560	115%	1,188	1,018	117%	2,986	2,578	116%
Total	12,255	12,914	95%	20,236	20,212	100%	32,491	33,126	98%

* Expected - 85% of 94 GAM and graded to 100% from ages 85 to 90 with selection

** Joint lives - joint policy at issue

John Alden Life Insurance Company
Policy Forms: J-5762-P & J-5875-P
Exhibit E1
Incidence Rates Per 100

Best Estimate						
Attained Age	Nursing Facility Care Incidence Rates				Incidence Rate Factors	
	Single Male	Single Female	Married Male	Married Female	Home and Community Based Care and Assisted Living Facility	Assisted Living Facility
40	0.0026	0.0028	0.0007	0.0006	1.550	0.300
41	0.0030	0.0032	0.0008	0.0007	1.550	0.300
42	0.0035	0.0038	0.0010	0.0009	1.550	0.300
43	0.0041	0.0044	0.0012	0.0011	1.550	0.300
44	0.0047	0.0052	0.0014	0.0013	1.550	0.300
45	0.0055	0.0061	0.0017	0.0015	1.550	0.300
46	0.0064	0.0071	0.0021	0.0018	1.550	0.300
47	0.0075	0.0083	0.0025	0.0022	1.550	0.300
48	0.0087	0.0097	0.0029	0.0027	1.550	0.300
49	0.0101	0.0113	0.0035	0.0032	1.550	0.300
50	0.0118	0.0132	0.0042	0.0039	1.550	0.300
51	0.0137	0.0154	0.0050	0.0046	1.550	0.300
52	0.0159	0.0180	0.0060	0.0056	1.550	0.300
53	0.0186	0.0210	0.0071	0.0067	1.550	0.300
54	0.0216	0.0245	0.0085	0.0081	1.550	0.300
55	0.0251	0.0287	0.0102	0.0097	1.550	0.300
56	0.0293	0.0335	0.0121	0.0117	1.550	0.300
57	0.0341	0.0391	0.0145	0.0141	1.550	0.300
58	0.0415	0.0478	0.0181	0.0178	1.436	0.290
59	0.0510	0.0589	0.0228	0.0225	1.311	0.290
60	0.0621	0.0721	0.0285	0.0284	1.206	0.280
61	0.0756	0.0880	0.0356	0.0357	1.111	0.270
62	0.0908	0.1061	0.0439	0.0444	1.045	0.270
63	0.1098	0.1287	0.0545	0.0555	0.969	0.260
64	0.1345	0.1582	0.0684	0.0702	0.872	0.260
65	0.1633	0.1927	0.0852	0.0881	0.795	0.250
66	0.1974	0.2339	0.1057	0.1102	0.728	0.240
67	0.2377	0.2826	0.1305	0.1371	0.671	0.240
68	0.2866	0.3420	0.1615	0.1709	0.613	0.230
69	0.3461	0.4144	0.2000	0.2134	0.555	0.230
70	0.4157	0.4995	0.2465	0.2650	0.507	0.220
71	0.4961	0.5982	0.3018	0.3269	0.470	0.220
72	0.5847	0.7075	0.3649	0.3983	0.452	0.210
73	0.6936	0.8422	0.4440	0.4884	0.425	0.210
74	0.8236	1.0036	0.5409	0.5995	0.397	0.200
75	0.9784	1.1964	0.6591	0.7363	0.369	0.200
76	1.1628	1.4269	0.8036	0.9046	0.341	0.190
77	1.3720	1.6896	0.9727	1.1034	0.323	0.190
78	1.6192	2.0010	1.1777	1.3462	0.305	0.190
79	1.8966	2.3521	1.4152	1.6301	0.297	0.180
80	2.2390	2.7864	1.7138	1.9893	0.279	0.180
81	2.6436	3.3016	2.0759	2.4283	0.261	0.170
82	3.0972	3.8817	2.4950	2.9409	0.253	0.170
83	3.6725	4.5348	3.0336	3.5246	0.235	0.170
84	4.3102	5.3067	3.7087	4.2518	0.227	0.160
85	5.0083	6.1939	4.5125	5.1104	0.219	0.160
86	5.7272	7.1457	5.4030	6.0464	0.212	0.150
87	6.4312	8.1148	6.3381	7.0025	0.204	0.150
88	7.0601	9.0222	7.2474	7.8861	0.196	0.150
89	7.5431	9.8230	7.8922	8.6499	0.188	0.140
90	8.2042	10.5318	8.5281	9.3379	0.180	0.140
91	8.7992	10.1727	8.1153	8.9693	0.182	0.140
92	9.4722	10.9131	8.7871	9.6917	0.174	0.130
93	10.1544	11.6738	9.4817	10.4358	0.166	0.130
94	10.7441	12.3384	10.1044	11.0975	0.169	0.130
95	11.3403	13.0218	10.7481	11.7790	0.171	0.130
96	11.4183	13.1114	10.8221	11.8600	0.163	0.120
97	11.3890	13.0777	10.7942	11.8295	0.166	0.120
98	11.3695	13.0553	10.7757	11.8093	0.168	0.120
99	11.3403	13.0218	10.7481	11.7790	0.171	0.110
100	11.3113	12.9885	10.7207	11.7489	0.174	0.110
101	11.2921	12.9664	10.7024	11.7289	0.176	0.110
102	11.2634	12.9335	10.6752	11.6991	0.179	0.110
103	11.2443	12.9116	10.6571	11.6793	0.181	0.100
104	11.2158	12.8788	10.6301	11.6497	0.184	0.100
105	11.1875	12.8463	10.6033	11.6202	0.187	0.100
106	11.1686	12.8247	10.5854	11.6007	0.189	0.100
107	11.1405	12.7924	10.5588	11.5715	0.192	0.100
108	11.1126	12.7603	10.5323	11.5424	0.195	0.100
109	11.0940	12.7390	10.5147	11.5232	0.197	0.100
110	11.0663	12.7071	10.4884	11.4944	0.200	0.100

John Alden Life Insurance Company
Policy Forms: J-5762-P & J-5875-P
Exhibit E2
Length of Stay Per \$1 of Daily Benefit

Best Estimate Length of Stay *				
Attained Age	Male		Female	
	No COLA	5% Compound COLA	No COLA	5% Compound COLA
40	510.60	669.38	556.93	706.48
41	510.60	669.38	556.93	706.48
42	510.60	669.38	556.93	706.48
43	510.60	669.38	556.93	706.48
44	510.60	669.38	556.93	706.48
45	510.60	669.38	556.93	706.48
46	510.60	669.38	556.93	706.48
47	510.60	669.38	556.93	706.48
48	510.60	669.38	556.93	706.48
49	510.60	669.38	556.93	706.48
50	510.60	669.38	556.93	706.48
51	510.60	669.38	556.93	706.48
52	510.60	669.38	556.93	706.48
53	506.31	661.90	536.81	675.39
54	502.20	654.75	518.29	647.25
55	498.25	647.94	501.17	621.63
56	494.47	641.44	485.24	598.17
57	490.83	635.24	470.37	576.56
58	487.34	629.32	456.41	556.57
59	483.99	623.67	443.26	537.98
60	480.77	618.27	430.84	520.62
61	477.68	613.13	419.06	504.35
62	474.70	608.22	407.86	489.04
63	475.43	593.05	436.64	524.28
64	480.60	587.46	468.08	563.44
65	489.10	588.47	502.66	607.56
66	500.26	594.32	541.09	658.19
67	513.68	603.89	584.39	717.71
68	505.55	588.63	606.96	738.67
69	499.22	576.50	631.40	762.39
70	494.31	566.77	657.70	788.75
71	490.55	558.96	685.89	817.66
72	487.72	552.68	715.98	849.10
73	488.58	550.11	722.19	849.87
74	490.55	549.68	730.00	854.29
75	493.29	550.58	738.90	860.99
76	496.60	552.42	748.64	869.21
77	500.37	554.95	759.04	878.57
78	502.58	556.05	763.54	881.06
79	505.09	557.55	768.49	884.19
80	507.88	559.42	773.87	887.93
81	510.93	561.64	779.68	892.27
82	514.24	564.18	785.92	897.23
83	503.58	550.16	774.77	878.83
84	494.10	537.86	765.75	864.14
85	485.55	526.89	758.19	851.88
86	477.75	516.98	751.74	841.38
87	470.58	507.94	746.17	832.22
88	455.63	490.14	711.00	788.00
89	442.03	474.05	679.70	749.24
90	429.60	459.44	651.51	714.77
91	418.17	446.08	625.89	683.77
92	407.63	433.83	602.47	655.67
93	407.63	433.83	602.47	655.67
94	407.63	433.83	602.47	655.67
95	407.63	433.83	602.47	655.67
96	407.63	433.83	602.47	655.67
97	407.63	433.83	602.47	655.67
98	407.63	433.83	602.47	655.67
99	407.63	433.83	602.47	655.67
100	407.63	433.83	602.47	655.67
101	407.63	433.83	602.47	655.67
102	407.63	433.83	602.47	655.67
103	407.63	433.83	602.47	655.67
104	407.63	433.83	602.47	655.67
105	407.63	433.83	602.47	655.67
106	407.63	433.83	602.47	655.67
107	407.63	433.83	602.47	655.67
108	407.63	433.83	602.47	655.67
109	407.63	433.83	602.47	655.67
110	407.63	433.83	602.47	655.67

* Based on SOA LTC Intercompany 2000-2011 Study and reinsurer's experiences. 4.5% interest. Lifetime Benefits, 90 Day Elimination Period

Combined Reinsurer Experience
Exhibit E3
Incidence A to E Analysis

Attained Age	Single Male				Single Female			
	Exposure	Claim Count	Expected Claim Count	A/E	Exposure	Claim Count	Expected Claim Count	A/E
40-44	1,302	0	0	0%	1,624	0	0	0%
45-49	4,044	5	1	601%	6,238	8	1	555%
50-54	9,506	6	4	144%	18,059	24	9	266%
55-59	20,377	36	19	191%	44,051	66	47	140%
60-64	33,982	72	66	109%	80,901	204	185	110%
65-69	43,918	178	180	99%	110,101	546	538	102%
70-74	41,786	355	357	99%	108,868	1,118	1,131	99%
75-79	29,031	530	523	101%	80,590	1,815	1,798	101%
80-84	15,764	617	598	103%	47,645	2,280	2,261	101%
85-89	5,955	439	434	101%	20,500	1,867	1,869	100%
90+	1,500	163	163	100%	6,111	871	773	113%
Total	207,166	2,401	2,345	102%	524,690	8,799	8,613	102%

Attained Age	Married Male				Married Female			
	Exposure	Claim Count	Expected Claim Count	A/E	Exposure	Claim Count	Expected Claim Count	A/E
40-44	4,250	0	0	0%	7,609	7	0	3670%
45-49	14,544	5	1	495%	23,203	16	1	1104%
50-54	38,365	22	6	342%	56,521	46	9	520%
55-59	91,380	80	37	218%	120,731	124	47	264%
60-64	168,363	229	161	142%	197,198	287	190	151%
65-69	222,945	512	505	101%	226,512	546	536	102%
70-74	204,081	1,043	1,091	96%	184,105	1,024	1,068	96%
75-79	130,981	1,737	1,665	104%	109,951	1,585	1,581	100%
80-84	61,107	1,855	1,847	100%	49,229	1,793	1,729	104%
85-89	19,205	1,342	1,333	101%	14,498	1,105	1,104	100%
90+	1,670	223	175	127%	2,455	300	269	111%
Total	956,890	7,048	6,821	103%	992,013	6,833	6,535	105%

John Alden Life Insurance Company
Combined Reinsurer Experience
Exhibit E4
Claim Termination A to E Analysis

Duration	Claim Exposure	Actual	Expected	A/E
1st quarter	1,946	524	627	84%
2nd quarter	4,726	749	651	115%
3rd quarter	4,010	362	379	96%
4th quarter	3,570	278	283	98%
2	12,547	2,953	3,128	94%
3	8,650	2,090	2,327	90%
4	5,877	1,860	1,766	105%
5	3,552	934	1,074	87%
6	2,305	557	656	85%
7	1,542	361	451	80%
8	1,036	234	286	82%
9	707	158	188	84%
10	478	109	145	75%
11	321	74	88	84%
12	209	53	73	73%
13	123	22	46	48%
14	85	42	25	166%
15	59	26	20	133%
16	38	15	8	188%
17	26	10	5	190%
18	17	6	2	314%
19	11	2	1	150%
20	6	1	1	138%
21	3	1	0	241%
Average	51,843	11,422	12,230	93%

John Alden Life Insurance Company
Nationwide Experience Projection
Policy Forms: J-5762-P and J-5875-P Combined
Exhibit F

		Before Proposed Rate Increase			With Proposed Rate Increase*		
		Earned Premium	Incurred Claims	Loss Ratio	Earned Premium	Incurred Claims*	Loss Ratio
Historical Experience	1992	25,360	0	0.0%	25,360	0	0.0%
	1993	746,128	136,808	18.3%	746,128	136,808	18.3%
	1994	2,295,491	8,756	0.4%	2,295,491	8,756	0.4%
	1995	6,029,427	533,026	8.8%	6,029,427	533,026	8.8%
	1996	9,649,677	754,308	7.8%	9,649,677	754,308	7.8%
	1997	17,125,508	885,971	5.2%	17,125,508	885,971	5.2%
	1998	16,734,963	2,005,950	12.0%	16,734,963	2,005,950	12.0%
	1999	16,179,464	3,176,941	19.6%	16,179,464	3,176,941	19.6%
	2000	17,308,264	3,153,971	18.2%	17,308,264	3,153,971	18.2%
	2001	16,391,917	6,167,067	37.6%	16,391,917	6,167,067	37.6%
	2002	15,107,651	6,089,682	40.3%	15,107,651	6,089,682	40.3%
	2003	14,691,168	8,303,099	56.5%	14,691,168	8,303,099	56.5%
	2004	14,005,972	9,891,733	70.6%	14,005,972	9,891,733	70.6%
	2005	14,109,360	8,430,323	59.7%	14,109,360	8,430,323	59.7%
	2006	13,186,553	10,245,618	77.7%	13,186,553	10,245,618	77.7%
	2007	12,332,679	13,115,913	106.4%	12,332,679	13,115,913	106.4%
	2008	11,823,815	14,918,705	126.2%	11,823,815	14,918,705	126.2%
	2009	12,330,008	19,953,802	161.8%	12,330,008	19,953,802	161.8%
	2010	12,163,149	17,518,262	144.0%	12,163,149	17,518,262	144.0%
	2011	11,602,563	19,970,616	172.1%	11,602,563	19,970,616	172.1%
	2012	11,562,075	20,090,702	173.8%	11,562,075	20,090,702	173.8%
	2013	11,432,042	18,053,996	157.9%	11,432,042	18,053,996	157.9%
2014	10,845,248	26,792,968	247.0%	10,845,248	26,792,968	247.0%	
2015	10,316,362	27,546,959	267.0%	10,316,362	27,546,959	267.0%	
2016	9,619,859	35,666,988	370.8%	9,619,859	35,666,988	370.8%	
2017	9,377,005	27,034,156	288.3%	9,377,005	27,034,156	288.3%	
2018	9,113,229	27,312,814	299.7%	9,113,229	27,312,814	299.7%	
2019	8,503,798	26,005,569	305.8%	8,503,798	26,005,569	305.8%	
2020	8,025,194	27,582,187	343.7%	8,025,194	27,582,187	343.7%	
Projected Future Experience	2021	7,320,695	26,485,335	361.8%	7,320,695	26,485,335	361.8%
	2022	6,311,212	25,916,932	410.6%	7,156,031	25,172,105	351.8%
	2023	5,437,797	25,165,084	462.8%	7,292,368	24,061,473	330.0%
	2024	4,680,824	24,265,092	518.4%	7,441,023	22,895,294	307.7%
	2025	4,023,234	23,265,311	578.3%	6,395,664	21,951,953	343.2%
	2026	3,451,308	22,170,206	642.4%	5,486,483	20,918,668	381.3%
	2027	2,953,344	21,004,162	711.2%	4,694,879	19,818,449	422.1%
	2028	2,519,621	19,814,229	786.4%	4,005,396	18,695,689	466.8%
	2029	2,141,931	18,594,530	868.1%	3,404,990	17,544,844	515.3%
	2030	1,813,549	17,340,353	956.2%	2,882,968	16,361,467	567.5%
	2031	1,528,769	16,119,198	1054.4%	2,430,257	15,209,247	625.8%
	2032	1,282,466	14,898,812	1161.7%	2,038,714	14,057,754	689.5%
	2033	1,070,204	13,680,782	1278.3%	1,701,285	12,908,484	758.7%
	2034	888,163	12,477,962	1404.9%	1,411,897	11,773,564	833.9%
	2035	732,858	11,274,050	1538.4%	1,165,011	10,637,614	913.1%
	2036	601,134	10,119,390	1683.4%	955,613	9,548,137	999.2%
	2037	490,019	9,022,614	1841.3%	778,975	8,513,275	1092.9%
	2038	396,852	7,974,489	2009.4%	630,868	7,524,318	1192.7%
	2039	319,266	6,999,488	2192.4%	507,531	6,604,357	1301.3%
	2040	255,079	6,085,946	2385.9%	405,495	5,742,386	1416.1%
	2041	202,389	5,260,824	2599.4%	321,734	4,963,844	1542.8%
	2042	159,442	4,518,217	2833.8%	253,463	4,263,157	1682.0%
	2043	124,705	3,841,533	3080.5%	198,242	3,624,674	1828.4%
	2044	96,839	3,240,359	3346.1%	153,943	3,057,436	1986.1%
	2045	74,682	2,708,827	3627.1%	118,721	2,555,910	2152.9%
	2046	57,213	2,251,563	3935.4%	90,950	2,124,459	2335.9%
	2047	43,534	1,858,642	4269.4%	69,205	1,753,719	2534.1%
	2048	32,911	1,514,440	4601.6%	52,318	1,428,948	2731.3%
	2049	24,733	1,224,631	4951.5%	39,317	1,155,498	2938.9%
	2050	18,483	987,144	5340.7%	29,383	931,418	3169.9%
	2051	13,738	796,199	5795.5%	21,839	751,253	3439.9%
	2052	10,161	639,962	6298.5%	16,152	603,836	3738.5%
	2053	7,483	513,483	6861.9%	11,896	484,496	4072.9%
2054	5,492	413,636	7532.0%	8,730	390,286	4470.6%	
2055	4,016	332,876	8289.0%	6,384	314,085	4919.9%	
2056	2,925	267,749	9154.9%	4,649	252,634	5433.8%	
2057	2,122	214,254	10095.9%	3,374	202,159	5992.4%	
2058	1,535	166,307	10834.2%	2,440	156,919	6430.6%	
2059	1,108	127,944	11545.9%	1,762	120,721	6853.0%	
2060	796	99,750	12532.4%	1,265	94,119	7438.5%	
Interest	Past	322,633,928	381,346,890	118.2%	322,633,928	381,346,890	118.2%
	Future	49,102,631	363,652,304	740.6%	69,511,910	345,653,982	497.3%
	Lifetime	371,736,559	744,999,194	200.4%	392,145,838	727,000,872	185.4%
Interest Factor	Past w/ int	639,199,803	563,265,571	88.1%	639,199,803	563,265,571	88.1%
	Future w/ int	39,115,382	252,842,008	646.4%	54,058,110	240,986,231	445.8%
	Lifetime w/ int	678,315,185	816,107,579	120.3%	693,257,913	804,251,801	116.0%

* Proposed rate increase: 3 Phases of 20.0% each; projection includes 3% shock lapse rate, 11% benefit reduction, and 2% of adverse selection.

John Alden Life Insurance Company
Pennsylvania Experience Projection
Policy Forms: J-5762-P and J-5875-P Combined
Exhibit G

		Before Proposed Rate Increase			With Proposed Rate Increase*		
		Earned Premium	Incurred Claims	Loss Ratio	Earned Premium	Incurred Claims*	Loss Ratio
Historical Experience	1992	0	0	0.0%	0	0	0.0%
	1993	4,505	0	0.0%	4,505	0	0.0%
	1994	17,333	0	0.0%	17,333	0	0.0%
	1995	61,041	202,693	332.1%	61,041	202,693	332.1%
	1996	164,553	72,907	44.3%	164,553	72,907	44.3%
	1997	481,040	190,115	39.5%	481,040	190,115	39.5%
	1998	541,312	26,968	5.0%	541,312	26,968	5.0%
	1999	582,190	0	0.0%	582,190	0	0.0%
	2000	605,639	584	0.1%	605,639	584	0.1%
	2001	576,569	17,600	3.1%	576,569	17,600	3.1%
	2002	536,178	130,495	24.3%	536,178	130,495	24.3%
	2003	519,265	3,063	0.6%	519,265	3,063	0.6%
	2004	505,141	141,554	28.0%	505,141	141,554	28.0%
	2005	508,997	73,827	14.5%	508,997	73,827	14.5%
	2006	485,418	630,940	130.0%	485,418	630,940	130.0%
	2007	454,789	130,120	28.6%	454,789	130,120	28.6%
	2008	426,121	872,979	204.9%	426,121	872,979	204.9%
	2009	451,632	239,134	52.9%	451,632	239,134	52.9%
	2010	393,150	378,493	96.3%	393,150	378,493	96.3%
	2011	369,644	976,199	264.1%	369,644	976,199	264.1%
	2012	393,195	130,426	33.2%	393,195	130,426	33.2%
	2013	391,408	277,957	71.0%	391,408	277,957	71.0%
2014	374,329	171,237	45.7%	374,329	171,237	45.7%	
2015	359,339	82,811	23.0%	359,339	82,811	23.0%	
2016	345,691	1,388,088	401.5%	345,691	1,388,088	401.5%	
2017	353,027	536,561	152.0%	353,027	536,561	152.0%	
2018	371,535	115,440	31.1%	371,535	115,440	31.1%	
2019	353,686	545,232	154.2%	353,686	545,232	154.2%	
2020	315,511	1,855,400	588.1%	315,511	1,855,400	588.1%	
Projected Future Experience	2021	294,224	806,809	274.2%	294,224	806,809	274.2%
	2022	255,819	795,330	310.9%	290,063	772,473	266.3%
	2023	222,328	779,457	350.6%	298,153	745,274	250.0%
	2024	193,095	755,641	391.3%	306,960	712,984	232.3%
	2025	167,542	728,111	434.6%	266,338	687,008	257.9%
	2026	145,121	699,776	482.2%	230,696	660,273	286.2%
	2027	125,428	664,921	530.1%	199,391	627,385	314.7%
	2028	108,109	634,333	586.8%	171,859	598,524	348.3%
	2029	92,798	602,008	648.7%	147,519	568,023	385.1%
	2030	79,301	561,773	708.4%	126,064	530,060	420.5%
	2031	67,489	520,698	771.5%	107,286	491,304	457.9%
	2032	57,161	479,984	839.7%	90,867	452,888	498.4%
	2033	48,155	443,659	921.3%	76,550	418,614	546.8%
	2034	40,319	409,530	1015.7%	64,095	386,411	602.9%
	2035	33,562	373,522	1112.9%	53,353	352,436	660.6%
	2036	27,773	340,986	1227.8%	44,150	321,737	728.7%
	2037	22,824	311,475	1364.7%	36,284	293,892	810.0%
	2038	18,621	282,277	1515.9%	29,601	266,342	899.8%
	2039	15,085	252,456	1673.5%	23,981	238,204	993.3%
	2040	12,135	225,614	1859.3%	19,290	212,878	1103.6%
	2041	9,681	201,562	2082.0%	15,390	190,184	1235.8%
	2042	7,658	173,799	2269.4%	12,174	163,988	1347.0%
	2043	6,010	145,393	2419.1%	9,554	137,185	1435.8%
	2044	4,676	122,104	2611.3%	7,433	115,211	1549.9%
	2045	3,603	99,655	2765.8%	5,728	94,029	1641.7%
	2046	2,748	81,088	2950.8%	4,368	76,510	1751.5%
	2047	2,071	65,791	3176.4%	3,293	62,077	1885.3%
	2048	1,542	52,782	3422.2%	2,452	49,802	2031.3%
	2049	1,133	41,765	3686.0%	1,801	39,408	2187.8%
	2050	822	32,085	3901.8%	1,307	30,274	2315.9%
	2051	589	24,215	4114.2%	936	22,848	2442.0%
	2052	415	17,796	4288.2%	660	16,792	2545.2%
	2053	288	12,813	4443.5%	458	12,090	2637.4%
2054	197	9,074	4602.3%	313	8,562	2731.7%	
2055	132	6,312	4771.3%	210	5,956	2832.0%	
2056	87	4,302	4934.2%	139	4,059	2928.7%	
2057	56	2,858	5115.7%	89	2,697	3036.4%	
2058	35	1,853	5261.7%	56	1,749	3123.1%	
2059	22	1,173	5425.0%	34	1,107	3220.0%	
2060	13	720	5608.5%	20	679	3328.9%	
Interest	Past	10,942,238	9,190,821	84.0%	10,942,238	9,190,821	84.0%
	Future	2,068,668	11,765,500	568.7%	2,943,141	11,178,726	379.8%
	Lifetime	13,010,905	20,956,322	161.1%	13,885,378	20,369,547	146.7%
Interest	Factor						
	Past w/ int	20,862,371	13,582,288	65.1%	20,862,371	13,582,288	65.1%
	Future w/ int	1,635,335	8,095,205	495.0%	2,271,344	7,712,179	339.5%
	Lifetime w/ int	22,497,706	21,677,493	96.4%	23,133,715	21,294,467	92.0%

* Proposed rate increase: 3 Phases of 20.0% each; projection includes 3% shock lapse rate, 11% benefit reduction, and 2% of adverse selection.

John Alden Life Insurance Company
Nationwide Experience Projection
Policy Form: J-5762-P
Attachment F1

Calendar Year		Before Proposed Rate Increase			With Proposed Rate Increase*			at: 4.70%	
		Earned Premium	Incurred Claims	Loss Ratio	Earned Premium	Incurred Claims	Loss Ratio	Year End 2020	Factor 1.0470
Historical Experience	1992	25,360	0	0.0%	25,360	0	0.0%	28.5	3.7024
	1993	746,128	136,808	18.3%	746,128	136,808	18.3%	27.5	3.5362
	1994	2,295,491	8,756	0.4%	2,295,491	8,756	0.4%	26.5	3.3774
	1995	5,980,381	533,026	8.9%	5,980,381	533,026	8.9%	25.5	3.2258
	1996	6,889,991	478,535	6.9%	6,889,991	478,535	6.9%	24.5	3.0810
	1997	6,523,412	699,642	10.7%	6,523,412	699,642	10.7%	23.5	2.9427
	1998	5,602,496	932,397	16.6%	5,602,496	932,397	16.6%	22.5	2.8106
	1999	5,068,109	2,336,766	46.1%	5,068,109	2,336,766	46.1%	21.5	2.6844
	2000	4,977,691	1,985,692	39.9%	4,977,691	1,985,692	39.9%	20.5	2.5639
	2001	4,723,934	3,460,155	73.2%	4,723,934	3,460,155	73.2%	19.5	2.4488
	2002	4,534,346	1,916,955	42.3%	4,534,346	1,916,955	42.3%	18.5	2.3389
	2003	4,406,370	4,951,837	112.4%	4,406,370	4,951,837	112.4%	17.5	2.2339
	2004	4,058,684	5,994,139	147.7%	4,058,684	5,994,139	147.7%	16.5	2.1336
	2005	3,996,911	3,216,316	80.5%	3,996,911	3,216,316	80.5%	15.5	2.0379
	2006	3,786,738	4,443,427	117.3%	3,786,738	4,443,427	117.3%	14.5	1.9464
	2007	3,652,881	5,721,847	156.6%	3,652,881	5,721,847	156.6%	13.5	1.8590
	2008	3,480,416	5,810,532	166.9%	3,480,416	5,810,532	166.9%	12.5	1.7756
	2009	3,647,125	10,208,184	279.9%	3,647,125	10,208,184	279.9%	11.5	1.6958
	2010	3,602,828	8,504,798	236.1%	3,602,828	8,504,798	236.1%	10.5	1.6197
	2011	3,393,542	7,452,915	219.6%	3,393,542	7,452,915	219.6%	9.5	1.5470
	2012	3,328,989	8,651,847	259.9%	3,328,989	8,651,847	259.9%	8.5	1.4776
	2013	3,307,972	8,132,115	245.8%	3,307,972	8,132,115	245.8%	7.5	1.4112
2014	3,064,829	10,099,682	329.5%	3,064,829	10,099,682	329.5%	6.5	1.3479	
2015	2,906,719	11,019,425	379.1%	2,906,719	11,019,425	379.1%	5.5	1.2874	
2016	2,657,350	17,429,996	655.9%	2,657,350	17,429,996	655.9%	4.5	1.2296	
2017	2,526,862	8,458,698	334.8%	2,526,862	8,458,698	334.8%	3.5	1.1744	
2018	2,420,534	8,751,769	361.6%	2,420,534	8,751,769	361.6%	2.5	1.1217	
2019	2,202,518	7,598,193	345.0%	2,202,518	7,598,193	345.0%	1.5	1.0713	
2020	2,007,540	8,315,027	414.2%	2,007,540	8,315,027	414.2%	0.5	1.0232	
Projected Future Experience	2021	1,788,940	8,174,607	457.0%	1,788,940	8,174,607	457.0%	-0.5	0.9773
	2022	1,479,601	7,649,615	517.0%	1,677,661	7,429,773	442.9%	-1.5	0.9334
	2023	1,223,843	7,077,709	578.3%	1,641,237	6,767,318	412.3%	-2.5	0.8915
	2024	1,012,012	6,492,538	641.5%	1,608,777	6,126,025	380.8%	-3.5	0.8515
	2025	836,193	5,915,922	707.5%	1,329,281	5,581,960	419.9%	-4.5	0.8133
	2026	690,228	5,354,597	775.8%	1,097,243	5,052,322	460.5%	-5.5	0.7768
	2027	569,083	4,829,116	848.6%	904,661	4,556,506	503.7%	-6.5	0.7419
	2028	468,505	4,349,913	928.5%	744,775	4,104,355	551.1%	-7.5	0.7086
	2029	384,993	3,909,451	1015.5%	612,017	3,688,757	602.7%	-8.5	0.6768
	2030	315,727	3,504,479	1110.0%	501,905	3,306,647	658.8%	-9.5	0.6464
	2031	258,349	3,136,513	1214.1%	410,693	2,959,453	720.6%	-10.5	0.6174
	2032	210,856	2,801,522	1328.6%	335,194	2,643,372	788.6%	-11.5	0.5897
	2033	171,594	2,503,105	1458.7%	272,779	2,361,802	865.8%	-12.5	0.5632
	2034	139,216	2,231,956	1603.2%	221,309	2,105,959	951.6%	-13.5	0.5379
	2035	112,566	1,980,506	1759.4%	178,945	1,868,704	1044.3%	-14.5	0.5138
	2036	90,684	1,753,120	1933.2%	144,159	1,654,154	1147.4%	-15.5	0.4907
	2037	72,761	1,540,358	2117.0%	115,668	1,453,403	1256.5%	-16.5	0.4687
	2038	58,126	1,346,933	2317.2%	92,403	1,270,897	1375.4%	-17.5	0.4476
	2039	46,205	1,176,785	2546.9%	73,451	1,110,354	1511.7%	-18.5	0.4275
	2040	36,526	1,013,886	2775.8%	58,065	956,651	1647.6%	-19.5	0.4084
	2041	28,715	865,017	3012.4%	45,648	816,186	1788.0%	-20.5	0.3900
	2042	22,438	729,362	3250.5%	35,670	688,188	1929.3%	-21.5	0.3725
	2043	17,435	609,893	3498.2%	27,715	575,463	2076.3%	-22.5	0.3558
	2044	13,464	508,406	3776.0%	21,404	479,706	2241.2%	-23.5	0.3398
	2045	10,339	420,988	4071.8%	16,436	397,223	2416.8%	-24.5	0.3246
	2046	7,897	347,412	4399.4%	12,553	327,800	2611.3%	-25.5	0.3100
	2047	6,000	285,224	4753.4%	9,539	269,123	2821.4%	-26.5	0.2961
	2048	4,543	230,402	5071.4%	7,222	217,396	3010.1%	-27.5	0.2828
	2049	3,432	185,729	5411.3%	5,456	175,245	3211.8%	-28.5	0.2701
	2050	2,591	150,269	5799.8%	4,119	141,786	3442.4%	-29.5	0.2580
	2051	1,958	121,708	6216.6%	3,112	114,837	3689.9%	-30.5	0.2464
	2052	1,484	98,503	6637.5%	2,359	92,942	3939.6%	-31.5	0.2353
	2053	1,130	81,144	7179.9%	1,797	76,563	4261.6%	-32.5	0.2248
2054	866	67,949	7845.3%	1,377	64,113	4656.5%	-33.5	0.2147	
2055	668	57,669	8627.3%	1,063	54,414	5120.7%	-34.5	0.2050	
2056	518	49,467	9554.8%	823	46,675	5671.2%	-35.5	0.1958	
2057	402	42,201	10488.1%	640	39,819	6225.2%	-36.5	0.1870	
2058	314	34,413	10969.9%	499	32,470	6511.1%	-37.5	0.1786	
2059	246	26,997	10996.5%	390	25,473	6526.9%	-38.5	0.1706	
2060	192	22,025	11454.9%	306	20,782	6799.0%	-39.5	0.1630	
Interest	Past	105,816,147	157,249,480	148.6%	105,816,147	157,249,480	148.6%		
	Future	10,090,642	81,677,409	809.4%	14,007,289	77,829,219	555.6%		
	Lifetime	115,906,789	238,926,890	206.1%	119,823,437	235,078,700	196.2%		
Interest	Factor								
	Past w/ int	229,572,588	245,222,370	106.8%	229,572,588	245,222,370	106.8%		
	Future w/ int	8,212,290	59,444,749	723.9%	11,123,163	56,817,362	510.8%		
	Lifetime w/ int	237,784,878	304,667,119	128.1%	240,695,751	302,039,732	125.5%		

* Proposed rate increase: 3 Phases of 20.0% each; projection includes 3% shock lapse rate, 11% benefit reduction, and 2% of adverse selection.

John Alden Life Insurance Company
Nationwide Experience Projection
Policy Form: J-5875-P
Attachment F2

Calendar Year		Before Proposed Rate Increase			With Proposed Rate Increase*			at:	4.50%
		Earned Premium	Incurred Claims	Loss Ratio	Earned Premium	Incurred Claims	Loss Ratio	Year End 2020	Factor 1.0450
Historical Experience	1992	0	0	0.0%	0	0	0.0%	28.5	3.5060
	1993	0	0	0.0%	0	0	0.0%	27.5	3.3550
	1994	0	0	0.0%	0	0	0.0%	26.5	3.2106
	1995	49,046	0	0.0%	49,046	0	0.0%	25.5	3.0723
	1996	2,759,686	275,773	10.0%	2,759,686	275,773	10.0%	24.5	2.9400
	1997	10,602,096	186,329	1.8%	10,602,096	186,329	1.8%	23.5	2.8134
	1998	11,132,467	1,073,553	9.6%	11,132,467	1,073,553	9.6%	22.5	2.6923
	1999	11,111,355	840,174	7.6%	11,111,355	840,174	7.6%	21.5	2.5763
	2000	12,330,573	1,168,280	9.5%	12,330,573	1,168,280	9.5%	20.5	2.4654
	2001	11,667,983	2,706,912	23.2%	11,667,983	2,706,912	23.2%	19.5	2.3592
	2002	10,573,305	4,172,727	39.5%	10,573,305	4,172,727	39.5%	18.5	2.2576
	2003	10,284,798	3,351,262	32.6%	10,284,798	3,351,262	32.6%	17.5	2.1604
	2004	9,947,288	3,897,594	39.2%	9,947,288	3,897,594	39.2%	16.5	2.0674
	2005	10,112,449	5,214,007	51.6%	10,112,449	5,214,007	51.6%	15.5	1.9783
	2006	9,399,816	5,802,190	61.7%	9,399,816	5,802,190	61.7%	14.5	1.8932
	2007	8,679,798	7,394,066	85.2%	8,679,798	7,394,066	85.2%	13.5	1.8116
	2008	8,343,399	9,108,173	109.2%	8,343,399	9,108,173	109.2%	12.5	1.7336
	2009	8,682,883	9,745,619	112.2%	8,682,883	9,745,619	112.2%	11.5	1.6590
	2010	8,560,321	9,013,463	105.3%	8,560,321	9,013,463	105.3%	10.5	1.5875
	2011	8,209,021	12,517,701	152.5%	8,209,021	12,517,701	152.5%	9.5	1.5192
	2012	8,233,085	11,438,854	138.9%	8,233,085	11,438,854	138.9%	8.5	1.4537
Projected Future Experience	2013	8,124,070	9,921,881	122.1%	8,124,070	9,921,881	122.1%	7.5	1.3911
	2014	7,780,419	16,693,286	214.6%	7,780,419	16,693,286	214.6%	6.5	1.3312
	2015	7,409,642	16,527,534	223.1%	7,409,642	16,527,534	223.1%	5.5	1.2739
	2016	6,962,509	18,236,992	261.9%	6,962,509	18,236,992	261.9%	4.5	1.2191
	2017	6,850,143	18,575,459	271.2%	6,850,143	18,575,459	271.2%	3.5	1.1666
	2018	6,692,694	18,561,044	277.3%	6,692,694	18,561,044	277.3%	2.5	1.1163
	2019	6,301,280	18,407,376	292.1%	6,301,280	18,407,376	292.1%	1.5	1.0683
	2020	6,017,654	19,267,160	320.2%	6,017,654	19,267,160	320.2%	0.5	1.0223
	2021	5,531,755	18,310,729	331.0%	5,531,755	18,310,729	331.0%	-0.5	0.9782
	2022	4,831,610	18,267,317	378.1%	5,478,370	17,742,332	323.9%	-1.5	0.9361
	2023	4,213,954	18,087,374	429.2%	5,651,132	17,294,155	306.0%	-2.5	0.8958
	2024	3,668,812	17,772,554	484.4%	5,832,246	16,769,269	287.5%	-3.5	0.8572
	2025	3,187,041	17,349,389	544.4%	5,066,383	16,369,993	323.1%	-4.5	0.8203
	2026	2,761,080	16,815,610	609.0%	4,389,240	15,866,346	361.5%	-5.5	0.7850
	2027	2,384,261	16,175,046	678.4%	3,790,217	15,261,943	402.7%	-6.5	0.7512
	2028	2,051,115	15,464,316	753.9%	3,260,622	14,591,334	447.5%	-7.5	0.7188
	2029	1,756,938	14,685,079	835.8%	2,792,973	13,856,086	496.1%	-8.5	0.6879
	2030	1,497,823	13,835,874	923.7%	2,381,062	13,054,820	548.3%	-9.5	0.6583
	2031	1,270,420	12,982,685	1021.9%	2,019,565	12,249,794	606.6%	-10.5	0.6299
	2032	1,071,610	12,097,290	1128.9%	1,703,519	11,414,382	670.0%	-11.5	0.6028
	2033	898,611	11,177,677	1243.9%	1,428,505	10,546,682	738.3%	-12.5	0.5768
	2034	748,947	10,246,006	1368.1%	1,190,588	9,667,605	812.0%	-13.5	0.5520
	2035	620,291	9,293,543	1498.3%	986,066	8,768,910	889.3%	-14.5	0.5282
	2036	510,450	8,366,271	1639.0%	811,454	7,893,983	972.8%	-15.5	0.5055
	2037	417,258	7,482,256	1793.2%	663,308	7,059,873	1064.3%	-16.5	0.4837
	2038	338,725	6,627,556	1956.6%	538,465	6,253,422	1161.3%	-17.5	0.4629
	2039	273,061	5,822,702	2132.4%	434,080	5,494,003	1265.7%	-18.5	0.4429
	2040	218,553	5,072,059	2320.7%	347,430	4,785,735	1377.5%	-19.5	0.4239
	2041	173,674	4,395,807	2531.1%	276,087	4,147,658	1502.3%	-20.5	0.4056
	2042	137,004	3,788,855	2765.5%	217,793	3,574,969	1641.5%	-21.5	0.3882
	2043	107,271	3,231,641	3012.6%	170,527	3,049,210	1788.1%	-22.5	0.3714
	2044	83,375	2,731,953	3276.7%	132,539	2,577,730	1944.9%	-23.5	0.3554
	2045	64,343	2,287,839	3555.7%	102,285	2,158,687	2110.5%	-24.5	0.3401
	2046	49,316	1,904,151	3861.1%	78,397	1,796,659	2291.8%	-25.5	0.3255
	2047	37,534	1,573,418	4192.0%	59,666	1,484,596	2488.2%	-26.5	0.3115
	2048	28,368	1,284,038	4526.3%	45,096	1,211,552	2686.6%	-27.5	0.2981
	2049	21,300	1,038,901	4877.4%	33,861	980,254	2894.9%	-28.5	0.2852
	2050	15,893	836,874	5265.8%	25,264	789,632	3125.5%	-29.5	0.2729
	2051	11,780	674,492	5725.6%	18,727	636,416	3398.4%	-30.5	0.2612
	2052	8,676	541,460	6240.5%	13,793	510,894	3704.0%	-31.5	0.2499
	2053	6,353	432,339	6805.4%	10,099	407,933	4039.3%	-32.5	0.2392
	2054	4,626	345,687	7473.4%	7,353	326,173	4435.8%	-33.5	0.2289
	2055	3,347	275,207	8221.4%	5,321	259,671	4879.8%	-34.5	0.2190
	2056	2,407	218,282	9068.9%	3,826	205,959	5382.8%	-35.5	0.2096
	2057	1,720	172,053	10004.2%	2,734	162,340	5937.9%	-36.5	0.2006
	2058	1,221	131,894	10799.4%	1,941	124,449	6409.9%	-37.5	0.1919
	2059	863	100,947	11702.3%	1,371	95,248	6945.9%	-38.5	0.1837
	2060	604	77,725	12875.6%	960	73,337	7642.3%	-39.5	0.1758
Past	216,817,780	224,097,410	103.4%	216,817,780	224,097,410	103.4%			
Future	39,011,989	281,974,895	722.8%	55,504,621	267,824,763	482.5%			
Lifetime	255,829,770	506,072,305	197.8%	272,322,401	491,922,172	180.6%			
Interest	Factor								
	Past w/ int	409,627,215	318,043,200	77.6%	409,627,215	318,043,200	77.6%		
	Future w/ int	30,903,091	193,397,260	625.8%	42,934,946	184,168,868	428.9%		
	Lifetime w/ int	440,530,307	511,440,460	116.1%	452,562,161	502,212,069	111.0%		

* Proposed rate increase: 3 Phases of 20.0% each; projection includes 3% shock lapse rate, 11% benefit reduction, and 2% of adverse selection.

John Alden Life Insurance Company
Pennsylvania Experience Projection
Policy Form: J-5762-P
Attachment G1

Calendar Year		Before Proposed Rate Increase			With Proposed Rate Increase*			at: 4.70%	
		Earned Premium	Incurred Claims	Loss Ratio	Earned Premium	Incurred Claims	Loss Ratio	Year End 2020	Factor 1.0470
Historical Experience	1992	0	0	0.0%	0	0	0.0%	28.5	3.7024
	1993	4,505	0	0.0%	4,505	0	0.0%	27.5	3.5362
	1994	17,333	0	0.0%	17,333	0	0.0%	26.5	3.3774
	1995	61,041	202,693	332.1%	61,041	202,693	332.1%	25.5	3.2258
	1996	135,071	72,907	54.0%	135,071	72,907	54.0%	24.5	3.0810
	1997	131,687	190,115	144.4%	131,687	190,115	144.4%	23.5	2.9427
	1998	117,205	0	0.0%	117,205	0	0.0%	22.5	2.8106
	1999	101,799	0	0.0%	101,799	0	0.0%	21.5	2.6844
	2000	92,752	584	0.6%	92,752	584	0.6%	20.5	2.5639
	2001	89,284	0	0.0%	89,284	0	0.0%	19.5	2.4488
	2002	83,322	0	0.0%	83,322	0	0.0%	18.5	2.3389
	2003	82,013	3,063	3.7%	82,013	3,063	3.7%	17.5	2.2339
	2004	76,468	60,303	78.9%	76,468	60,303	78.9%	16.5	2.1336
	2005	76,429	0	0.0%	76,429	0	0.0%	15.5	2.0379
	2006	78,218	207,078	264.7%	78,218	207,078	264.7%	14.5	1.9464
	2007	66,048	1,693	2.6%	66,048	1,693	2.6%	13.5	1.8590
	2008	60,806	0	0.0%	60,806	0	0.0%	12.5	1.7756
	2009	69,700	201,454	289.0%	69,700	201,454	289.0%	11.5	1.6958
	2010	65,924	4,375	6.6%	65,924	4,375	6.6%	10.5	1.6197
	2011	58,459	0	0.0%	58,459	0	0.0%	9.5	1.5470
Projected Future Experience	2012	67,073	129,084	192.5%	67,073	129,084	192.5%	8.5	1.4776
	2013	57,328	0	0.0%	57,328	0	0.0%	7.5	1.4112
	2014	57,973	16,275	28.1%	57,973	16,275	28.1%	6.5	1.3479
	2015	53,117	23,504	44.2%	53,117	23,504	44.2%	5.5	1.2874
	2016	48,940	1,288	2.6%	48,940	1,288	2.6%	4.5	1.2296
	2017	53,788	184,498	343.0%	53,788	184,498	343.0%	3.5	1.1744
	2018	53,170	13,766	25.9%	53,170	13,766	25.9%	2.5	1.1217
	2019	46,906	0	0.0%	46,906	0	0.0%	1.5	1.0713
	2020	41,129	713,212	1734.1%	41,129	713,212	1734.1%	0.5	1.0232
	2021	33,934	128,869	379.8%	33,934	128,869	379.8%	-0.5	0.9773
	2022	28,288	122,370	432.6%	32,075	118,853	370.6%	-1.5	0.9334
	2023	23,564	116,780	495.6%	31,601	111,659	353.3%	-2.5	0.8915
	2024	19,586	109,122	557.1%	31,136	102,962	330.7%	-3.5	0.8515
	2025	16,233	98,872	609.1%	25,806	93,290	361.5%	-4.5	0.8133
	2026	13,428	90,683	675.3%	21,346	85,564	400.8%	-5.5	0.7768
	2027	11,078	82,280	742.8%	17,610	77,635	440.9%	-6.5	0.7419
	2028	9,127	75,178	823.7%	14,509	70,934	488.9%	-7.5	0.7086
	2029	7,491	69,277	924.8%	11,909	65,367	548.9%	-8.5	0.6768
	2030	6,124	63,442	1035.9%	9,735	59,860	614.9%	-9.5	0.6464
	2031	4,987	56,992	1142.8%	7,928	53,775	678.3%	-10.5	0.6174
2032	4,045	50,648	1252.1%	6,430	47,789	743.2%	-11.5	0.5897	
2033	3,262	45,510	1395.3%	5,185	42,941	828.2%	-12.5	0.5632	
2034	2,611	40,325	1544.3%	4,151	38,049	916.6%	-13.5	0.5379	
2035	2,076	35,153	1693.5%	3,300	33,169	1005.2%	-14.5	0.5138	
2036	1,637	30,350	1854.3%	2,602	28,637	1100.6%	-15.5	0.4907	
2037	1,277	25,250	1977.1%	2,030	23,825	1173.5%	-16.5	0.4687	
2038	987	20,765	2103.1%	1,570	19,593	1248.3%	-17.5	0.4476	
2039	754	17,138	2273.2%	1,198	16,171	1349.2%	-18.5	0.4275	
2040	568	14,009	2465.1%	903	13,219	1463.1%	-19.5	0.4084	
2041	422	11,404	2700.8%	671	10,760	1603.1%	-20.5	0.3900	
2042	309	9,149	2963.5%	491	8,633	1759.0%	-21.5	0.3725	
2043	222	7,188	3236.1%	353	6,783	1920.8%	-22.5	0.3558	
2044	157	5,475	3485.9%	250	5,166	2069.0%	-23.5	0.3398	
2045	109	4,050	3707.0%	174	3,821	2200.3%	-24.5	0.3246	
2046	75	2,942	3940.5%	119	2,776	2338.9%	-25.5	0.3100	
2047	50	2,095	4199.0%	79	1,977	2492.3%	-26.5	0.2961	
2048	33	1,468	4476.8%	52	1,385	2657.2%	-27.5	0.2828	
2049	21	1,005	4771.0%	33	948	2831.8%	-28.5	0.2701	
2050	13	674	5096.7%	21	636	3025.1%	-29.5	0.2580	
2051	8	441	5450.3%	13	416	3235.0%	-30.5	0.2464	
2052	5	281	5842.1%	8	265	3467.6%	-31.5	0.2353	
2053	3	172	6354.3%	4	162	3771.6%	-32.5	0.2248	
2054	2	101	6630.5%	2	96	3935.5%	-33.5	0.2147	
2055	1	59	7034.2%	1	56	4175.1%	-34.5	0.2050	
2056	0	33	7382.5%	1	31	4381.8%	-35.5	0.1958	
2057	0	17	9643.8%	0	16	5724.0%	-36.5	0.1870	
2058	0	8	9767.3%	0	8	5797.3%	-37.5	0.1786	
2059	0	2	113018.9%	0	2	67081.9%	-38.5	0.1706	
2060	0	0	0.0%	0	0	0.0%	-39.5	0.1630	
Past Future Lifetime	Past	1,947,491	2,025,893	104.0%	1,947,491	2,025,893	104.0%		
	Future	192,487	1,339,579	695.9%	267,230	1,276,095	477.5%		
	Lifetime	2,139,978	3,365,472	157.3%	2,214,721	3,301,988	149.1%		
Interest Factor	Past w/ int	4,131,452	3,536,261	85.6%	4,131,452	3,536,261	85.6%		
	Future w/ int	157,280	986,005	626.9%	213,210	941,930	441.8%		
	Lifetime w/ int	4,288,732	4,522,266	105.4%	4,344,662	4,478,191	103.1%		

* Proposed rate increase: 3 Phases of 20.0% each; projection includes 3% shock lapse rate, 11% benefit reduction, and 2% of adverse selection.

John Alden Life Insurance Company
Pennsylvania Experience Projection
Policy Form: J-5875-P
Attachment G2

Calendar Year		Before Proposed Rate Increase			With Proposed Rate Increase*			at:	4.50%
		Earned Premium	Incurred Claims	Loss Ratio	Earned Premium	Incurred Claims	Loss Ratio	Year End 2020	Factor 1.0450
Historical Experience	1992	0	0	0.0%	0	0	0.0%	28.5	3.5060
	1993	0	0	0.0%	0	0	0.0%	27.5	3.3550
	1994	0	0	0.0%	0	0	0.0%	26.5	3.2106
	1995	0	0	0.0%	0	0	0.0%	25.5	3.0723
	1996	29,481	0	0.0%	29,481	0	0.0%	24.5	2.9400
	1997	349,354	0	0.0%	349,354	0	0.0%	23.5	2.8134
	1998	424,107	26,968	6.4%	424,107	26,968	6.4%	22.5	2.6923
	1999	480,392	0	0.0%	480,392	0	0.0%	21.5	2.5763
	2000	512,887	0	0.0%	512,887	0	0.0%	20.5	2.4654
	2001	487,285	17,600	3.6%	487,285	17,600	3.6%	19.5	2.3592
	2002	452,856	130,495	28.8%	452,856	130,495	28.8%	18.5	2.2576
	2003	437,252	0	0.0%	437,252	0	0.0%	17.5	2.1604
	2004	428,672	81,250	19.0%	428,672	81,250	19.0%	16.5	2.0674
	2005	432,568	73,827	17.1%	432,568	73,827	17.1%	15.5	1.9783
	2006	407,200	423,862	104.1%	407,200	423,862	104.1%	14.5	1.8932
	2007	388,741	128,427	33.0%	388,741	128,427	33.0%	13.5	1.8116
	2008	365,315	872,979	239.0%	365,315	872,979	239.0%	12.5	1.7336
	2009	381,931	37,680	9.9%	381,931	37,680	9.9%	11.5	1.6590
	2010	327,226	374,118	114.3%	327,226	374,118	114.3%	10.5	1.5875
	2011	311,184	976,199	313.7%	311,184	976,199	313.7%	9.5	1.5192
Projected Future Experience	2012	326,122	1,342	0.4%	326,122	1,342	0.4%	8.5	1.4537
	2013	334,079	277,957	83.2%	334,079	277,957	83.2%	7.5	1.3911
	2014	316,356	154,962	49.0%	316,356	154,962	49.0%	6.5	1.3312
	2015	306,222	59,306	19.4%	306,222	59,306	19.4%	5.5	1.2739
	2016	296,750	1,386,800	467.3%	296,750	1,386,800	467.3%	4.5	1.2191
	2017	299,240	352,063	117.7%	299,240	352,063	117.7%	3.5	1.1666
	2018	318,365	101,674	31.9%	318,365	101,674	31.9%	2.5	1.1163
	2019	306,780	545,232	177.7%	306,780	545,232	177.7%	1.5	1.0683
	2020	274,382	1,142,187	416.3%	274,382	1,142,187	416.3%	0.5	1.0223
	2021	260,290	677,940	260.5%	260,290	677,940	260.5%	-0.5	0.9782
	2022	227,531	672,960	295.8%	257,988	653,620	253.4%	-1.5	0.9361
	2023	198,764	662,676	333.4%	266,552	633,615	237.7%	-2.5	0.8958
	2024	173,509	646,519	372.6%	275,824	610,022	221.2%	-3.5	0.8572
	2025	151,309	629,239	415.9%	240,532	593,718	246.8%	-4.5	0.8203
	2026	131,693	609,093	462.5%	209,350	574,709	274.5%	-5.5	0.7850
	2027	114,350	582,641	509.5%	181,781	549,750	302.4%	-6.5	0.7512
	2028	98,982	559,156	564.9%	157,351	527,591	335.3%	-7.5	0.7188
	2029	85,306	532,730	624.5%	135,610	502,657	370.7%	-8.5	0.6879
	2030	73,177	498,331	681.0%	116,328	470,200	404.2%	-9.5	0.6583
	2031	62,502	463,706	741.9%	99,359	437,529	440.4%	-10.5	0.6299
2032	53,116	429,336	808.3%	84,437	405,099	479.8%	-11.5	0.6028	
2033	44,893	398,149	886.9%	71,365	375,673	526.4%	-12.5	0.5768	
2034	37,708	369,205	979.1%	59,943	348,362	581.2%	-13.5	0.5520	
2035	31,486	338,369	1074.6%	50,054	319,267	637.9%	-14.5	0.5282	
2036	26,136	310,636	1188.5%	41,548	293,100	705.5%	-15.5	0.5055	
2037	21,547	286,224	1328.4%	34,253	270,067	788.4%	-16.5	0.4837	
2038	17,634	261,511	1483.0%	28,032	246,748	880.2%	-17.5	0.4629	
2039	14,331	235,318	1642.0%	22,782	222,034	974.6%	-18.5	0.4429	
2040	11,566	211,605	1829.5%	18,387	199,659	1085.9%	-19.5	0.4239	
2041	9,259	190,159	2053.8%	14,719	179,424	1219.0%	-20.5	0.4056	
2042	7,349	164,650	2240.3%	11,683	155,355	1329.7%	-21.5	0.3882	
2043	5,788	138,204	2387.7%	9,201	130,403	1417.2%	-22.5	0.3714	
2044	4,519	116,628	2580.9%	7,184	110,045	1531.9%	-23.5	0.3554	
2045	3,494	95,605	2736.4%	5,554	90,208	1624.2%	-24.5	0.3401	
2046	2,673	78,146	2923.2%	4,250	73,735	1735.1%	-25.5	0.3255	
2047	2,021	63,695	3151.1%	3,213	60,100	1870.3%	-26.5	0.3115	
2048	1,510	51,314	3399.3%	2,400	48,418	2017.7%	-27.5	0.2981	
2049	1,112	40,760	3665.5%	1,768	38,459	2175.6%	-28.5	0.2852	
2050	809	31,411	3882.3%	1,286	29,638	2304.3%	-29.5	0.2729	
2051	580	23,774	4095.6%	923	22,432	2430.9%	-30.5	0.2612	
2052	410	17,516	4270.0%	652	16,527	2534.4%	-31.5	0.2499	
2053	286	12,642	4425.4%	454	11,928	2626.7%	-32.5	0.2392	
2054	196	8,973	4586.5%	311	8,466	2722.3%	-33.5	0.2289	
2055	131	6,254	4756.9%	209	5,901	2823.5%	-34.5	0.2190	
2056	87	4,269	4921.7%	138	4,028	2921.2%	-35.5	0.2096	
2057	56	2,841	5101.4%	89	2,681	3027.9%	-36.5	0.2006	
2058	35	1,845	5251.0%	56	1,741	3116.7%	-37.5	0.1919	
2059	22	1,171	5415.8%	34	1,105	3214.5%	-38.5	0.1837	
2060	13	720	5608.9%	20	679	3329.1%	-39.5	0.1758	
Past	8,994,747	7,164,928	79.7%	8,994,747	7,164,928	79.7%			
Future	1,876,180	10,425,921	555.7%	2,675,910	9,902,631	370.1%			
Lifetime	10,870,927	17,590,849	161.8%	11,670,657	17,067,559	146.2%			
Interest	Factor								
Past w/ int	16,730,919	10,046,027	60.0%	16,730,919	10,046,027	60.0%			
Future w/ int	1,478,055	7,109,200	481.0%	2,058,134	6,770,249	329.0%			
Lifetime w/ int	18,208,973	17,155,227	94.2%	18,789,053	16,816,276	89.5%			

* Proposed rate increase: 3 Phases of 20.0% each; projection includes 3% shock lapse rate, 11% benefit reduction, and 2% of adverse selection.

John Alden Life Insurance Company
Policy Form: J-5762-P
Exhibit H1
Nationwide Policy and Premium Distribution

	Policies	Premium	% of Policies	% of Premium
Base				
Comprehensive 100% HHC	120	305,204	10%	14%
Comprehensive 50% HHC	429	910,052	36%	42%
Facility Only	649	939,598	54%	44%
Total	1,198	2,154,855	100%	100%
COLA Options				
No COLA	494	729,341	41%	34%
Compound COLA 5%	684	1,398,200	57%	65%
Simple COLA 5%	20	27,314	2%	1%
Total	1,198	2,154,855	100%	100%
Nonforfeiture Options				
None	809	1,289,108	68%	60%
Full ROP	323	722,356	27%	34%
Limited ROP	66	143,391	6%	7%
Total	1,198	2,154,855	100%	100%
Joint/Single Life				
Joint	327	724,295	27%	34%
Single	871	1,430,560	73%	66%
Total	1,198	2,154,855	100%	100%
Billing Mode				
Annual	682	1,241,486	57%	58%
Semi-Annual	61	113,507	5%	5%
Quarterly	126	234,099	11%	11%
Monthly	329	565,762	27%	26%
Total	1,198	2,154,855	100%	100%
Elimination Period				
0 Day	277	524,302	23%	24%
30 Days	9	18,859	1%	1%
90 Days	798	1,405,319	67%	65%
180 Days	114	206,375	10%	10%
Total	1,198	2,154,855	100%	100%
Benefit Period (NH/HH)				
3 Year / 3 Year	198	289,689	17%	13%
Lifetime / Lifetime	1,000	1,865,166	83%	87%
Total	1,198	2,154,855	100%	100%
Issue Age Cohort				
20-29	1	928	0%	0%
30-39	2	1,081	0%	0%
40-49	73	82,340	6%	4%
50-59	371	533,262	31%	25%
60-69	689	1,367,949	58%	63%
70-79	62	169,294	5%	8%
Total	1,198	2,154,855	100%	100%

John Alden Life Insurance Company
Policy Form: J-5875-P
Exhibit H2
Nationwide Policy and Premium Distribution

	Policies	Premium	% of Policies	% of Premium
Base				
Comprehensive w/ Reimbursement HHC	1,002	2,205,768	32%	34%
Comprehensive w/ Indemnity HHC	1,097	2,536,171	35%	40%
Facility Only with ALF	360	658,856	12%	10%
Facility Only	642	994,194	21%	16%
Total	3,101	6,394,988	100%	100%
COLA Options				
No COLA	781	1,230,728	25%	19%
Compound COLA 5%	1,199	2,681,621	39%	42%
Simple COLA 5%	1,121	2,482,639	36%	39%
Total	3,101	6,394,988	100%	100%
Nonforfeiture Options				
None	2,728	5,398,597	88%	84%
Full ROP	257	697,036	8%	11%
SBP NFO	3	11,847	0%	0%
Limited ROP	113	287,509	4%	4%
Total	3,101	6,394,988	100%	100%
Joint/Single Life				
Joint	1,209	2,973,267	39%	46%
Single	1,892	3,421,721	61%	54%
Total	3,101	6,394,988	100%	100%
Billing Mode				
Annual	1,598	3,247,843	52%	51%
Semi-Annual	165	344,415	5%	5%
Quarterly	321	675,628	10%	11%
Monthly	1,017	2,127,102	33%	33%
Total	3,101	6,394,988	100%	100%
Elimination Period				
0 Day	162	345,138	5%	5%
30 Days	485	1,053,912	16%	16%
90 Days	2,303	4,690,425	74%	73%
180 Days	151	305,513	5%	5%
Total	3,101	6,394,988	100%	100%
Benefit Period (NH/HH)				
2 Year / 2 Year	53	75,101	2%	1%
3 Year / 2 Year	23	38,427	1%	1%
3 Year / 3 Year	251	460,279	8%	7%
4 Year / 2 Year	58	119,064	2%	2%
4 Year / 3 Year	28	56,684	1%	1%
4 Year / 4 Year	281	531,133	9%	8%
Lifetime / 2 Year	144	334,608	5%	5%
Lifetime / 3 Year	253	565,919	8%	9%
Lifetime / 4 Year	152	338,023	5%	5%
Lifetime / Lifetime	1,858	3,875,751	60%	61%
Total	3,101	6,394,988	100%	100%
Issue Age Cohort				
20-29	1	609	0%	0%
30-39	10	7,364	0%	0%
40-49	185	248,549	6%	4%
50-59	1,158	2,067,769	37%	32%
60-69	1,591	3,578,544	51%	56%
70-79	156	492,154	5%	8%
Total	3,101	6,394,988	100%	100%

John Alden Life Insurance Company
Policy Form: J-5762-P
Exhibit H3
Pennsylvania Policy and Premium Distribution

	Policies	Premium	% of Policies	% of Premium
Base				
Comprehensive 100% HHC	1	1,550	4%	3%
Comprehensive 50% HHC	9	19,388	36%	41%
Facility Only	15	26,386	60%	56%
Total	25	47,323	100%	100%
COLA Options				
No COLA	15	24,499	60%	52%
Compound COLA 5%	10	22,825	40%	48%
Simple COLA 5%	0	0	0%	0%
Total	25	47,323	100%	100%
Nonforfeiture Options				
None	25	47,323	100%	100%
Full ROP	0	0	0%	0%
Limited ROP	0	0	0%	0%
Total	25	47,323	100%	100%
Joint/Single Life				
Joint	9	21,207	36%	45%
Single	16	26,117	64%	55%
Total	25	47,323	100%	100%
Billing Mode				
Annual	12	19,413	48%	41%
Semi-Annual	2	5,308	8%	11%
Quarterly	5	10,845	20%	23%
Monthly	6	11,758	24%	25%
Total	25	47,323	100%	100%
Elimination Period				
0 Day	8	15,416	32%	33%
30 Days	1	1,088	4%	2%
90 Days	13	23,552	52%	50%
180 Days	3	7,268	12%	15%
Total	25	47,323	100%	100%
Benefit Period (NH/HH)				
3 Year / 3 Year	2	4,853	8%	10%
Lifetime / Lifetime	23	42,470	92%	90%
Total	25	47,323	100%	100%
Issue Age Cohort				
20-29	0	0	0%	0%
30-39	0	0	0%	0%
40-49	0	0	0%	0%
50-59	8	11,791	32%	25%
60-69	15	30,680	60%	65%
70-79	2	4,852	8%	10%
Total	25	47,323	100%	100%

John Alden Life Insurance Company
Policy Form: J-5875-P
Exhibit H4
Pennsylvania Policy and Premium Distribution

	Policies	Premium	% of Policies	% of Premium
Base				
Comprehensive w/ Reimbursement HHC	78	198,200	66%	67%
Comprehensive w/ Indemnity HHC	21	53,805	18%	18%
Facility Only with ALF	2	9,488	2%	3%
Facility Only	18	35,968	15%	12%
Total	119	297,462	100%	100%
COLA Options				
No COLA	26	53,458	22%	18%
Compound COLA 5%	35	95,640	29%	32%
Simple COLA 5%	58	148,364	49%	50%
Total	119	297,462	100%	100%
Nonforfeiture Options				
None	100	236,128	84%	79%
Full ROP	12	39,859	10%	13%
SBP NFO	0	0	0%	0%
Limited ROP	7	21,475	6%	7%
Total	119	297,462	100%	100%
Joint/Single Life				
Joint	49	129,428	41%	44%
Single	70	168,034	59%	56%
Total	119	297,462	100%	100%
Billing Mode				
Annual	64	154,371	54%	52%
Semi-Annual	6	15,376	5%	5%
Quarterly	12	36,572	10%	12%
Monthly	37	91,143	31%	31%
Total	119	297,462	100%	100%
Elimination Period				
0 Day	9	25,013	8%	8%
30 Days	16	43,359	13%	15%
90 Days	88	215,199	74%	72%
180 Days	6	13,890	5%	5%
Total	119	297,462	100%	100%
Benefit Period (NH/HH)				
2 Year / 2 Year	4	5,338	3%	2%
3 Year / 2 Year	0	0	0%	0%
3 Year / 3 Year	11	19,105	9%	6%
4 Year / 2 Year	1	1,169	1%	0%
4 Year / 3 Year	1	3,938	1%	1%
4 Year / 4 Year	10	20,142	8%	7%
Lifetime / 2 Year	3	7,259	3%	2%
Lifetime / 3 Year	8	18,658	7%	6%
Lifetime / 4 Year	0	0	0%	0%
Lifetime / Lifetime	81	221,854	68%	75%
Total	119	297,462	100%	100%
Issue Age Cohort				
20-29	0	0	0%	0%
30-39	0	0	0%	0%
40-49	8	15,650	7%	5%
50-59	46	98,266	39%	33%
60-69	57	157,487	48%	53%
70-79	8	26,058	7%	9%
Total	119	297,462	100%	100%

John Alden Life Insurance Company

Policy Form: J-5762-P

Exhibit B1

Rates and Factors After Proposed Increase (20%)

Individual / Standard Risk / Lifetime Benefit Period / 90 Day Elimination Period

Issue Age	LTNC Level Premium Per \$10 Daily Benefit	Benefit Increase Factors	Other Riders	
		Compound	Limited SB/COC	Full SB/COC
40	49.68	2.45	1.20	1.260
41	52.17	2.45	1.21	1.273
42	54.64	2.45	1.22	1.286
43	57.13	2.45	1.23	1.299
44	59.61	2.45	1.24	1.312
45	62.10	2.45	1.25	1.325
46	64.58	2.45	1.26	1.338
47	67.07	2.45	1.27	1.351
48	69.55	2.45	1.28	1.364
49	72.04	2.45	1.29	1.377
50	74.52	2.45	1.30	1.390
51	78.24	2.40	1.31	1.403
52	81.97	2.35	1.32	1.416
53	85.69	2.30	1.33	1.429
54	89.42	2.25	1.34	1.442
55	93.15	2.20	1.35	1.455
56	100.59	2.16	1.36	1.468
57	108.05	2.12	1.37	1.481
58	115.50	2.08	1.38	1.494
59	122.96	2.04	1.39	1.507
60	130.40	2.00	1.40	1.520
61	145.31	1.96	1.41	1.533
62	160.21	1.92	1.42	1.546
63	175.11	1.88	1.43	1.559
64	190.02	1.84	1.44	1.572
65	204.92	1.80	1.45	1.585
66	238.46	1.77	1.46	1.598
67	272.00	1.74	1.47	1.611
68	305.53	1.71	1.48	1.624
69	339.06	1.68	1.49	1.637
70	372.60	1.65	1.50	1.650
71	440.91	1.62	1.51	1.663
72	509.22	1.59	1.52	1.676
73	577.52	1.56	1.53	1.689
74	645.84	1.53	1.54	1.702
75	714.15	1.50	1.55	1.715
76	807.30	1.47	1.56	1.728
77	900.44	1.44	1.57	1.741
78	993.60	1.41	1.58	1.754
79	1,086.75	1.38	1.59	1.767
80	1,179.90	1.35	1.60	1.780
81	1,266.84	1.32	1.61	1.793
82	1,353.78	1.29	1.62	1.806
83	1,440.72	1.26	1.63	1.819
84	1,527.66	1.23	1.64	1.832

Issue Age Independent Factors

Risk Classes		Elimination Period		Payment Mode	
Preferred	0.70	0-Day	1.50	Annual	1.00
Standard	1.00	30-Day	1.30	Semi-Annual	0.52
Substandard1	1.25	90-Day	1.00	Quarterly	0.27
Substandard2	1.50	180-Day	0.80	Monthly	0.10
Non-level Premium Factor		HHC Benefit Rider Elimination & Premium Factor		Other Factors	
First Year	2.000	0 Visits (50%)	0.75	Joint Factor	1.50
Renewal Years	0.667	0 Visits (100%)	1.50	3-Yr Benefit Period	0.70
		30 Visits (50%)	0.65	Group Discount	0.10
		30 Visits (100%)	1.30	First Day of Coverage	1.25

John Alden Life Insurance Company
Policy Form: J-5875-P
Exhibit B2
Rates and Factors After Proposed Increase (20%)
Individual / Standard Risk / Lifetime Benefit Period / 90 Day Elimination Period

Issue Age	LTNC Level Premium Per \$10 Daily Benefit	HCBC Reimbursement Premium	HCBC Indemnity Premium	Benefit Increase Factors		Other Riders			
				Compound	Simple	10-Pay Factor	Limited COC Factor	Full COC Factor	SBP Factor
40	43.47	34.77	43.47	2.45	1.80	1.90	1.244	1.330	1.122
41	45.63	36.51	45.63	2.45	1.80	1.89	1.252	1.340	1.126
42	47.82	38.26	47.82	2.45	1.80	1.88	1.259	1.350	1.130
43	49.99	39.98	49.99	2.45	1.80	1.87	1.267	1.360	1.134
44	52.17	41.73	52.17	2.45	1.80	1.86	1.274	1.370	1.137
45	54.33	43.47	54.33	2.45	1.80	1.85	1.281	1.380	1.141
46	56.52	45.21	56.52	2.45	1.80	1.84	1.289	1.390	1.145
47	58.69	46.94	58.69	2.45	1.80	1.83	1.296	1.400	1.148
48	60.85	48.68	60.85	2.45	1.80	1.82	1.304	1.410	1.152
49	63.02	50.42	63.02	2.45	1.80	1.81	1.311	1.420	1.156
50	65.21	52.17	65.21	2.45	1.80	1.80	1.319	1.430	1.160
51	68.47	54.77	68.47	2.40	1.78	1.79	1.326	1.440	1.163
52	71.72	57.38	71.72	2.35	1.76	1.78	1.333	1.450	1.167
53	74.99	60.00	74.99	2.30	1.74	1.77	1.344	1.465	1.172
54	78.24	62.59	78.24	2.25	1.72	1.76	1.356	1.480	1.178
55	81.51	65.21	81.51	2.20	1.70	1.75	1.367	1.495	1.184
56	88.02	70.43	88.02	2.16	1.68	1.73	1.378	1.510	1.189
57	94.56	75.64	94.56	2.12	1.66	1.71	1.389	1.525	1.195
58	101.08	80.87	101.08	2.08	1.64	1.69	1.400	1.540	1.200
59	107.61	86.08	107.61	2.04	1.62	1.67	1.411	1.555	1.206
60	114.12	91.29	114.12	2.00	1.60	1.65	1.422	1.570	1.211
61	129.71	103.76	129.71	1.96	1.58	1.63	1.433	1.585	1.217
62	145.31	116.25	145.31	1.92	1.56	1.61	1.444	1.600	1.222
63	160.93	128.75	160.93	1.88	1.54	1.59	1.467	1.630	1.234
64	176.52	141.22	176.52	1.84	1.52	1.57	1.489	1.660	1.245
65	192.11	153.69	192.11	1.80	1.50	1.55	1.511	1.690	1.256
66	218.90	175.11	218.90	1.77	1.48	1.53	1.533	1.720	1.267
67	245.67	196.54	245.67	1.74	1.46	1.51	1.556	1.750	1.278
68	272.46	217.97	272.46	1.71	1.44	1.49	1.578	1.780	1.289
69	299.24	239.38	299.24	1.68	1.42	1.47	1.600	1.810	1.300
70	326.03	260.82	326.03	1.65	1.40	1.45	1.622	1.840	1.311
71	376.87	301.49	376.87	1.62	1.38	1.43	1.644	1.870	1.322
72	427.70	342.17	427.70	1.59	1.36	1.41	1.667	1.900	1.334
73	478.56	382.85	478.56	1.56	1.34	1.39	1.681	1.920	1.341
74	529.40	423.51	529.40	1.53	1.32	1.37	1.696	1.940	1.348
75	580.24	464.19	580.24	1.50	1.30	1.35	1.711	1.960	1.356
76	670.68	536.54	670.68	1.47	1.28	1.33	1.726	1.980	1.363
77	761.11	608.88	761.11	1.44	1.26	1.31	1.741	2.000	1.371
78	851.52	681.22	851.52	1.41	1.24	1.29	1.748	2.010	1.374
79	941.97	753.58	941.97	1.38	1.22	1.27	1.756	2.020	1.378
80	1,032.42	825.92	1,032.42	1.35	1.20	1.25	1.763	2.030	1.382
81	1,122.85	898.28	1,122.85	1.32	1.19	1.23	1.770	2.040	1.385
82	1,213.27	970.61	1,213.27	1.29	1.18	1.21	1.778	2.050	1.389
83	1,303.70	1,042.96	1,303.70	1.26	1.17	1.19	1.785	2.060	1.393
84	1,394.15	1,115.32	1,394.15	1.23	1.16	1.17	1.793	2.070	1.397
Issue Age Independent Factors									
Risk Classes		Elimination Period		Payment Mode		Benefit Period		Other Factors	
Accept	0.80	0-Day	1.30	Annual	1.00	2-Year	0.60	Joint Factor	1.50
Standard	1.00	30-Day	1.15	Semi-Annual	0.52	3-Year	0.70	ALF Benefit Rider	1.14
Substandard	1.20	90-Day	1.00	Quarterly	0.27	4-Year	0.80		
		180-Day	0.90	Monthly	0.085				
Non-level Premium Factor		Endorsed Group Discount							
First Year	2.00	Ages 40-64	0.15						
Renewal Years	0.75	Ages 65+	0.10						

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Supporting Document Schedules

Satisfied - Item:	Transmittal Letter (A&H)
Comments:	
Attachment(s):	John Alden Rate Filing Cover Letter PA.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Actuarial Certification (A&H)
Bypass Reason:	See Actuarial Memo
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Memorandum and Explanatory Information (A&H)
Comments:	
Attachment(s):	John Alden Rate Increase Act Memo w Attachment PA.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Advertisements (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Authorization to File (A&H)
Comments:	
Attachment(s):	2021- John Alden TPA authorization.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Insert Page Explanation (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Satisfied - Item:	Rate Table (A&H)
Comments:	Rate Table is attached in the Rate/Rule Schedule
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Replacement Form with Highlighted Changes (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Advertisement Compliance Certification
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Reserve Calculation (A&H)
Bypass Reason:	Please see Rate/Rule Schedule
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Variability Explanation (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	John Alden Rate Increase Act Memo Attachment PA in Excel
Comments:	
Attachment(s):	John Alden Rate Increase Act Memo Attachment PA.xlsx
Item Status:	
Status Date:	

Satisfied - Item:	JALIC PA Objection Response Attachments 08 17 21
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State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Comments:	
Attachment(s):	JALIC PA Objection Response Attachments 08 17 21.pdf
Item Status:	
Status Date:	
Satisfied - Item:	PA Response Letter 08 17 21
Comments:	
Attachment(s):	PA Response Letter 08 17 21.pdf
Item Status:	
Status Date:	
Satisfied - Item:	J-NFO
Comments:	A copy of the policyholder rate increase notification letter is provided. • J-NFO.pdf is to be used for policies with a non-forfeiture rider
Attachment(s):	J-NFO.pdf
Item Status:	
Status Date:	
Satisfied - Item:	J-NPO
Comments:	A copy of the policyholder rate increase notification letter is provided. • J-NPO.pdf is to be used for policies without any non-forfeiture rider
Attachment(s):	J-NPO.pdf
Item Status:	
Status Date:	
Satisfied - Item:	JALIC PA Objection Response Attachments 08 17 21.xlsx
Comments:	
Attachment(s):	JALIC PA Objection Response Attachments 08 17 21.xlsx
Item Status:	
Status Date:	
Satisfied - Item:	PA Response Letter 10 05 21
Comments:	
Attachment(s):	PA Response Letter 10 05 21.pdf
Item Status:	
Status Date:	

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Satisfied - Item:	JALIC PA Objection Response Attachments 10 05 21
Comments:	
Attachment(s):	JALIC PA Objection Response Attachments 10 05 21.xlsx
Item Status:	
Status Date:	

Satisfied - Item:	PA Response Letter 10 25 21
Comments:	
Attachment(s):	PA Response Letter 10 25 21.pdf
Item Status:	
Status Date:	

State:	Pennsylvania	Filing Company:	John Alden Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Lifetime Independence		
Project Name/Number:	/		

Attachment John Alden Rate Increase Act Memo Attachment PA.xlsx is not a PDF document and cannot be reproduced here.

Attachment JALIC PA Objection Response Attachments 08 17 21.xlsx is not a PDF document and cannot be reproduced here.

Attachment JALIC PA Objection Response Attachments 10 05 21.xlsx is not a PDF document and cannot be reproduced here.



LifeCare Assurance Company
LifeCare Administrators
21600 Oxnard Street, Suite 1500
Post Office Box 4243
Woodland Hills, CA 91367
(818) 887-4436 / Fax (818) 887-4595

August 3, 2021

Jessica Altman, Commissioner
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, Pennsylvania 17120

Re: John Alden Life Insurance Company
NAIC No: 65080

Policy Form: Guaranteed Renewable Long Term Nursing Care Policy J-5762-P-PA
Guaranteed Renewable Long Term Nursing Care Policy J-5762-P-1-PA
Guaranteed Renewable Long Term Nursing Care Policy J-5875-P-PA
Guaranteed Renewable Long Term Nursing Care Policy J-5875-P-PA(Q)
Guaranteed Renewable Long Term Nursing Care Policy J-5875-P-1-PA

Dear Commissioner Jessica Altman:

This rate filing is submitted on behalf of John Alden Life Insurance Company (the "company") for your review.

Individual policy form J-5762-P-PA et al., issued from 1993 to 1996, provides benefits for confinement in a qualified nursing facility or Home Health Care. Individual policy forms J-5875-P-PA et al., issued from 1996 to 2000, provide benefits for confinement in a qualified nursing facility, Assisted Living Facility, or Home Health care. These policy forms are no longer marketed in any state.

The company is requesting the approval of a uniform three year phase in flat increase of 20% each year on the current base rates, resulting in a cumulative 72.8% increase. The details of the rate increase are in the actuarial memorandum submitted with this cover letter.

The company will provide the following options to the policyholders to reduce the impact of the rate increase:

- Reduce the daily benefits, subject to a minimum of \$20
- Change benefit options to lower the premium
- Offer a paid up option which provides a benefit pool equal to the premiums paid

The following items are included in this submission:

- This cover letter
- A letter from John Alden Life Insurance Company authorizing us to submit this filing on their behalf
- An actuarial memorandum and rate schedules
- Any other state required form



LifeCare Assurance Company
LifeCare Administrators
21600 Oxnard Street, Suite 1500
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Woodland Hills, CA 91367
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The contact person for this filing is:

Phillip Oh, FSA, MAAA
Consulting Actuary
21600 Oxnard Street, Suite 1500
Woodland Hills, CA 91367
800-366-5463 ext. 2264
Phillip.Oh@LifeCareAssurance.com

Thank you for your assistance in reviewing this filing.

Sincerely,

A handwritten signature in black ink, appearing to be "Phillip Oh", with a long, sweeping horizontal line extending to the right.

Phillip Oh, FSA, MAAA
Consulting Actuary

John Alden Life Insurance Company

Home Office: P.O. Box 3050 Milwaukee, WI 53201-3050

Company NAIC No. 65080

Administrative Office: Post Office Box 4243

Woodland Hills, California 91365-4243

Actuarial Memorandum

August 2021

Guaranteed Renewable Long Term Nursing Care Policy	J-5762-P-PA
Guaranteed Renewable Long Term Nursing Care Policy	J-5762-P-1-PA
Guaranteed Renewable Long Term Nursing Care Policy	J-5875-P-PA
Guaranteed Renewable Long Term Nursing Care Policy	J-5875-P-PA (Q)
Guaranteed Renewable Long Term Nursing Care Policy	J-5875-P-1-PA

The above referenced individual Long Term Care (LTC) policy forms provide benefits for confinement in a qualified Nursing Facility, Assisted Living Facility, or for Home and Community Based Care. Policy forms for the John Alden product 'Independent Life Plan' are referred to as 'J-5762' or 'J-5762-P' in this memorandum. Policy forms for the John Alden product 'Lifetime Independence Plan' are referred to as 'J-5875' or 'J-5875-P' in this memorandum. Form J-5762 was issued from 1993 to 1996, and Form J-5875 was issued from 1996 to 2000 in Pennsylvania. These policy forms are no longer being marketed in any state.

1. Purpose of Filing

This is a rate increase filing for existing Long-Term Care policy forms. This actuarial memorandum has been prepared for the purpose of demonstrating that the requested rate increase meets the minimum requirements of the 2014 National Association of Insurance Commissioners (NAIC) Long-Term Care Insurance Model Regulation and the applicable regulatory requirements of this jurisdiction. It may not be suitable for other purposes.

2. Scope of Filing

This filing applies to the Company's LTC policy forms as specified above. These forms provide daily benefits for qualified long-term care services in various settings, as summarized in Exhibit A, when the insured meets policy benefit qualification requirements.

The forms included in this filing are individual LTC policies that are guaranteed renewable for life, subject to the Company's right to change premium rates.

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These policy forms were issue age rated and fully underwritten. The issue ages were from 40 to 84 on an age nearest birthday basis, except for endorsed groups where the issue age range was 18 to 84 in some jurisdictions. Strict underwriting criteria were administered with the use of various underwriting tools in addition to the application, which may have included medical records, an attending physician's statement, telephone interview and/or face-to-face assessment.

These policy forms were marketed by individual agents who primarily sell on an individual basis.

The proposed rate increase applies to all inforce policies as these forms are no longer being marketed. Paid-up policies will not receive a rate increase.

The number of policyholders and the annual inforce premium, as of December 2020, is displayed in Exhibit A1. The exhibit also shows the average annual premium before and after the proposed rate increase.

3. Reason for the Increase

A rate increase is necessary at this time due to significantly higher anticipated future and lifetime loss ratios. The higher loss ratios result from a combination of lower lapse, lower death, longer claim continuance, and lower investment earnings on the assets.

John Alden Life has been evaluating this block and updating assumptions based on the actual experience as well as the industry experience. For the policy forms specified above, the projected experience is now worse than what original pricing assumptions were projecting. The combined effect of updating the lapse, mortality, and morbidity assumptions to better reflect the actual experience, as well as industry data, resulted in the need for a rate increase.

The current premium levels are inadequate. Therefore, the Company is requesting a rate increase to help alleviate the adverse performance on this block of business.

John Alden Life Insurance Company

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Woodland Hills, California 91365-4243

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4. Requested Rate Increase

The Company is requesting the approval of the following increases:

J-5762 & J-5875: Three-year phase-in flat increase of 20% each year on the current base rates; this is a cumulative 72.8% increase on the current base rates.

The increase does not vary by issue age or other policy characteristics. The new premium for any contract is equal to the product of the contract's current premium and one plus the base premium increase percentage. Paid-up policies will not be affected by the rate increase.

Please see Exhibits B1 & B2 for rate tables reflecting the rate increase:

Exhibit B1: J-5762 proposed rates

Exhibit B2: J-5875 proposed rates

Please note that the actual rates implemented may vary slightly from those in the rate pages due to implementation rounding algorithms.

5. History of Previous Rate Revisions

a. J-5762

An average increase of 25% was approved on 5/6/2008.

A flat increase of 15% was approved on 12/15/2011.

A flat increase of 20% was approved on 12/14/2016.

b. J-5875

An average increase of 25% was approved on 5/6/2008.

A flat increase of 15% was approved on 12/15/2011.

A flat increase of 20% was approved on 12/14/2016.

John Alden Life Insurance Company

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their claims are incurred, grading down from 36.05% of all claims at age 40, to 6.38% at age 80, and then 0% at age 120. Utilization factors are then applied to the claim costs, which are as follows: 68% for COLA reimbursement policies and 86% for non-COLA reimbursement policies. No underwriting selection durational factors or morbidity improvements are assumed in the projection.

Policy design features have been taken into consideration. Benefit provisions, elimination periods, benefit periods, number of units, benefit growth, etc. have been accounted for either in the development of claim costs or projection model formulas.

Exhibit E1 shows the best estimate incidence rates by gender and marital status. Exhibit E2 demonstrates the best estimate lengths of stay for lifetime benefit period, 90-day elimination period policies with and without 5% Compound COLA.

Exhibits E3 and E4 contain the analysis of actual to expected incidence and termination respectively, with expected based on best estimate assumptions, for the combined reinsurer LTC blocks.

e. Expenses

Expenses have not been explicitly projected. It is assumed that the originally filed expense assumptions remain appropriate.

f. Rate Increase Impact on Policyholder Behavior

At the time of a rate increase, policyholders have the option to elect a Contingent Benefit Upon Lapse (CBUL) or reduced benefit options (RBO). An increase in morbidity for adverse selection due to the rate increase is also assumed based on the percentage of policyholders that elect CBUL and RBO.

Policyholders who elect a CBUL are modeled as a shock lapse. The shock lapse assumption represents policyholders who are assumed to drop their policies instead of accepting a rate increase. The RBO assumption represents policyholders who are assumed to choose to reduce benefits in order to offset all or some of the rate increase. The adverse selection associated with the requested increase is a function of CBUL and RBO election. The reasoning for a permanent shift in morbidity due to adverse selection is that the insureds remaining after the increase are those who choose to accept the rate increase (i.e., the insureds who think they will use the policy) and are a less healthy population (will use more benefits) than the pre-filing cohort. For those who lapse the policy, the assumption is that the insureds are healthier and less likely to need the policy as they do not value the policy enough to pay a higher premium.

The following provides approximate averages for these assumptions: 3% shock lapse, 11% RBO election

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rate, and 2% morbidity increase due to adverse selection.

The projections in Exhibits F and G assume the 1st, 2nd, and 3rd phase increases are expected to occur in 2022, 2023, and 2024, respectively.

The above assumptions are based on the experience of policies issued by the Company, reinsurer and industry experience, and actuarial judgment. The best estimate assumptions reflect an estimate of the most likely outcome and do not reflect an explicit margin for conservatism.

7. Area Factors and Trend Assumptions

Area factors were not used in pricing for the above-listed policy forms. As this is not medical insurance, an explicit medical cost trend is not included in the projections.

8. Reserves

Active life reserves have not been used in this rate increase analysis. Claim reserves as of December 31, 2020 have been discounted to the incurral date of each respective claim and included in historical incurred claims. Incurred but not reported reserve (IBNR) balances as of December 31, 2020 have been allocated to a calendar year of incurral and included in historical incurred claims. Paid claims have been discounted to the incurral date and included in historical incurred claims. Claim reserves are calculated for active and pending claimants as the present value of benefit payments discounted by interest and terminations. The IBNR is based on lag factors which are applied to the claim reserves and survivor payments based on the difference between the incurral date and the valuation date.

9. Past and Future Policy Experience

Earned premiums and incurred claims for projection years 2021 through 2060 are developed from an active lives model representing actual contracts in force as of December 31, 2020. The best estimate assumptions described above for morbidity, voluntary lapse, and mortality are used to project earned premiums and incurred claims.

Nationwide and statewide historical experience and projections before and after the proposed rate increase are

John Alden Life Insurance Company

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shown as follows:

Policy Form	Nationwide	Pennsylvania
J-5762	Exhibit F1	Exhibit G1
J-5875	Exhibit F2	Exhibit G2
Combined	Exhibit F	Exhibit G

Historical experience is shown by claim incurral year with the loss ratio for each loss year calculated by the following formula:

$$LR_j = \frac{\sum_{t=j}^{2020} Pmt_t^j \times v^{t-j} + {}_jCR_{2020} \times v^{2020-j+0.5} + {}_jIBNR_{2020} \times v^{2020-j+0.5}}{EP_j}$$

LR_j = loss ratio for year j

Pmt_t^j = claim payments in year t on claims incurred in year j , assumed to occur midyear

${}_jCR_{2020}$ = claim reserve held on December 31, 2020 for claims incurred in year j

${}_jIBNR_{2020}$ = incurred but not reported reserve as of December 31, 2020 attributable to claims incurred in year j

EP_j = earned premium in year j , assumed mid-year

j = year of incurral

- **J-5762:** $v = 1 / 1.047 = 0.955110$
- **J-5875:** $v = 1 / 1.045 = 0.956938$

Future anticipated loss ratio is calculated, with and without interest, as anticipated incurred claims divided by earned premiums. The lifetime loss ratio as of December 31, 2020 is calculated as the sum of accumulated past experience and discounted future experience where accumulation and discounting occur at the maximum valuation interest rate.

10. Analysis Performed

The originally approved premium schedule was based on pricing assumptions believed to be appropriate, given industry experience available when the originally approved rate schedule was developed. The original pricing assumptions for voluntary lapse, mortality, and claim costs were as follows:

a. Original Pricing Ultimate Lapse

J-5762: 5.0%

J-5875: 7.5%

John Alden Life Insurance Company

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Administrative Office: Post Office Box 4243

Woodland Hills, California 91365-4243

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b. Original Pricing Mortality

J-5762 & J-5875: 1975-80 Select and Ultimate

c. Original Pricing Morbidity

Original pricing claim costs for skilled, intermediate, and Facility Care Benefits are derived from The Reports of the Society of Actuaries based on the 1985 National Nursing Home Survey Utilization Data in Transactions, Society of Actuaries, 1988-89-90 Reports; and the Long Term Care Intercompany Study: 1984-1991 Experience in Transactions, Society of Actuaries, 1993-94 Reports. Claim costs factors shown in the original actuarial memorandum are applied to the inforce lives and represent the expected cost per life of incurred benefits.

Joint claim cost factors:

J-5762 & J-5875: 150% of the claim costs of the older insured

Underwriting selection factors:

J-5762: 20%, 40%, 60%, 80%, 100% durations 5 & later

J-5875: 10%, 20%, 40%, 60%, 80%, 100% durations 6 & later

d. Original Pricing Interest

J-5762 & J-5875: 7%

As part of the inforce management of the business, the reinsurer and administrator of the business monitor the performance of the business by completing periodic actual-to-expected analysis for voluntary lapse, mortality, claim incidence, and claim termination. The findings from these analyses were used in projecting the inforce business to determine the effect of experience on the projected lifetime loss ratio. An analysis of the projected lifetime loss ratio based on current best estimate assumptions compared to that assumed at the time of original pricing revealed that experience had deteriorated significantly.

The best estimate assumptions used in this filing (described in Section 6) are based on actual inforce experience of the Company, experience of the reinsurer's similarly underwritten and administered LTC products, industry experience, and actuarial judgment. Actual persistency and claim continuance have been higher than what were assumed in the original pricing.

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11. Loss Ratio Requirement Compliance Demonstration

Nationwide Exhibits F, F1, and F2, and Statewide Exhibits G, G1, and G2, show actual and projected experience using current best estimate assumptions. Actual experience is provided from inception through 2020 and then projected on a seriatim basis for 40 years using the current assumptions described above in Section 6. Included in Exhibits F, F1, F2, G, G1, and G2 are calendar year earned premiums, incurred claims, annual loss ratios, and cumulative loss ratios. As shown in Exhibits F, F1, F2, G, G1, and G2, the anticipated lifetime loss ratios with the requested rate increase exceed the minimum loss ratio required by pre-rate stability regulation.

12. Proposed Effective Date

The rate increase will apply to policies on their policy anniversary date following at least a 60-day policyholder notification period after approval.

13. Nationwide Distribution of Business as of December 31, 2020

As of December 31, 2020, the number of policies in force that will be affected by this increase by policy form is shown in the following Exhibits:

Policy Form	Nationwide	Pennsylvania
J-5762	Exhibit H1	Exhibit H3
J-5875	Exhibit H2	Exhibit H4

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August 2021

14. Actuarial Certification

I am a Fellow of the Society of Actuaries and a Member of the American Academy of Actuaries; I meet the Academy's qualification standards for preparing health rate filings and am familiar with the requirements for filing long-term care insurance premium rate increases.

This memorandum has been prepared in conformity with all applicable Actuarial Standards of Practice, including ASOP No. 8 and No. 18.

The data used to develop this actuarial memorandum was provided by LifeCare Assurance Company, the administrator of the policies. I have reviewed the data for reasonableness.

To the best of my knowledge and judgment, I hereby certify that:

- this rate submission is in compliance with the applicable laws and regulations of the jurisdiction where it is filed;
- policy design, underwriting, and claims adjudication practices have been taken into consideration;
- the rates are not excessive or unfairly discriminatory and bear a reasonable relationship to the benefits based on the loss ratio standards of this jurisdiction;
- this filing will enhance premium adequacy, but not enough to prevent future rate actions. However, if the requested rate increase is approved in full, the company will not file for a future rate increase that would result in a combined nationwide lifetime loss ratio less than 115%; and
- the relationship between renewal premium rate schedules and new business premium rate schedules is not applicable because the company is no longer marketing new business in any state.



Phillip Oh, FSA, MAAA
Consulting Actuary

Date: August 3, 2021

John Alden Life Insurance Company
Policy Forms: J-5762-P & J-5875-P

Exhibit A: Benefit Summary
(Does not reflect state variations)

General Information	J-5762	J-5875
Available Coverage	Nursing Care or Home Health Care	Nursing Care or Home Health Care
Benefit Trigger	Medical Necessity, 2 of 5 ADL's, or Severe Cognitive Impairment	Medical Necessity, 2 of 5 ADL's, or Severe Cognitive Impairment
Benefit Pool	Yes	Yes
Underwriting classes	Preferred, Standard, Substandard1, Substandard2	Accept, Standard, Substandard
Employer/Association Group Discount	10% for all ages	15% for ages 40-64 10% for ages 65+
Available Issue Ages	40 – 84 (age nearest birthday) 18 – 84 (age nearest, endorsed groups)	40 – 84 (age nearest birthday) 18 – 84 (age nearest, endorsed groups)
Maximum Daily Benefit Amount	\$10 to \$200 (\$10 increments)	\$20 to \$250 (\$10 increments)
Benefit Period	3 yrs, Lifetime	2 yrs, 3 yrs, 4 yrs, Lifetime
Payment Options	Lifetime	Lifetime, 10-year pay
Elimination period	0, 30, 90, 180 days	0, 30, 90, 180 days
Bed Reservation Benefit	N/A	\$10 per day, up to 14 days per calendar year, when insured incurs charges to reserve a bed in a Long Term Care Facility during hospitalization.
Alternative Plan of Care	N/A	Alternate Plan of Care Benefit provides medical or non-medical benefits agreed upon by insured, Physician, and the Company which may enable the insured to end Long Term Care Facility confinement and recover at home or in an alternative facility.
Waiver of Premium Benefit	Waiver of Premium Benefit is provided after confinement in a Long Term Care Facility for a period of 90 consecutive days.	Waiver of Premium Benefit is provided after confinement in a Long Term Care Facility for a period of 90 consecutive days.
Personal Care Advisor	N/A	Personal Care Advisor, accessible through toll-free telephone number, is assigned to insured upon claim to provide assistance with any questions.
Renewability	Guaranteed renewable for life	Guaranteed renewable for life

Riders/Endorsements	Description	J-5762	J-5875
5% Simple Inflation	This rider increases the original daily benefit amount by 5% annually. Increases are made regardless of claims status.	Available (Only in Georgia)	Available
5% Compound Inflation	This rider increases the daily benefit amount by 5%, compounded annually. Increases are made regardless of claims status.	Available	Available
Home Health Care Rider	\$5.00 per day or \$10.00 per day of Home Health Care Benefit payable after an elimination period of 0, 30, 90, or 180 days. An Alternative Plan of Care is also available if insured is otherwise qualified for benefits under the policy or rider. Under joint coverage this benefit is payable to either or both insureds, if qualified.	Available	Not Available
Full Survivor Benefit and Continuation of Coverage Rider	A Full Survivor Benefit equal to the total of all premiums paid is payable to the beneficiary upon the death of the insured (second to die in the case of joint coverage). A Continuation of Coverage Benefit is payable in the event the policy lapses for nonpayment of premiums. This benefit is equal to the total of premiums paid less claims paid.	Available	Not Available
Limited Survivor Benefit and Continuation of Coverage Rider	A Limited Survivor Benefit equal to the total of all premiums paid less claims paid is payable to the beneficiary upon the death of the insured (second to die in the case of joint coverage). A Continuation of Coverage Benefit is payable in the event the policy lapses for nonpayment of premiums. This benefit is equal to the total of premiums paid less claims paid.	Available	Not Available
Limited Nonforfeiture Benefits Rider	A Limited Nonforfeiture Benefit equal to the total of all premiums paid less claims paid is payable to the beneficiary upon the death of the insured (second to die in the case of joint coverage). A Continuation of Coverage Benefit is payable in the event the policy lapses for nonpayment of premiums. This benefit is equal to the total of premiums paid less claims paid. A limited Survivor Benefit equal to the total of all premiums paid less claims paid is payable to the beneficiary upon the death of the insured (second to die in the case of joint coverage).	Available	Not Available
Optional Cash Nonforfeiture Benefits Option Rider	Provides the same benefits as the Limited Nonforfeiture Benefits Rider for Guaranteed Assistance Care and Continuation of Coverage, plus the following: A Full Survivor Benefit equal to the total of all premiums paid is payable upon the death of the insured (second to die in the case of joint coverage). A Cash Nonforfeiture Benefit is available upon surrender of the rider. The Cash Nonforfeiture Benefit is equal to a percentage of the difference between the first year annual premium and the annual renewal premium.	Available	Not Available
Home and Community Based Care Reimbursement Benefit Rider	This rider pays 100% of actual expenses incurred up to the maximum daily benefit chosen for services provided by a licensed professional nurse or therapist. 80% of actual expenses incurred up to maximum daily benefit chosen is paid for adult day care, confinement in a qualified Assisted Living Facility, homemaker services, services provided by a qualified Home Care Agency and respite care (maximum of 21 days per calendar year). Premiums are waived after 90 consecutive days of confinement in an Assisted Living Facility. Benefits are payable after the elimination period. The insured may choose a maximum daily benefit between 50% and 100% of the daily benefit for Long Term Nursing Care and may also choose a benefit period less than or equal to the benefit period for Long Term Nursing Care.	Not Available	Available
Home and Community Based Care Indemnity Benefit Rider	This rider pays the full daily benefit amount chosen for the same care and services described under the Reimbursement Benefit Rider. Benefits are payable after the elimination period. The insured may choose a daily benefit between 50% and 100% of the daily benefit for Long Term Nursing Care and may also choose benefit period less than or equal to the benefit period for Long Term Nursing Care.	Not Available	Available
Assisted Living Facility Benefit Rider	After satisfaction of the elimination period, this rider pays 70% of the Long Term Nursing Care daily benefit for confinement in a qualified Assisted Living Facility. Premiums are waived after 90 consecutive days of confinement in such a facility. This rider is not available if either one of the Home and Community Based Care Benefit Riders is purchased.	Not Available	Available
Shortened Benefit Period Nonforfeiture Rider	This rider provides the nonforfeiture credit as proposed for adoption by the NAIC. If the policy has been in force for at least three years and lapses due to nonpayment of premiums, coverage will continue and benefits will be payable at the daily benefit amount in effect on the date of lapse. The minimum benefit payable under the rider will be at least 30 times the daily benefit amount in effect on the date of lapse. Any Cost of Living Rider attached to the policy will terminate with the lapse of the policy and the benefit payable under this rider will be the daily benefit in effect on the date of lapse.	Not Available	Available
Full Continuation of Coverage Benefit Rider	This rider provides a nonforfeiture benefit without a claims offset in the event of policy lapse. If the policy lapses due to nonpayment of premium, coverage will continue and benefits will be payable at the daily benefit amount in effect on the date of lapse. The number of days remaining for which benefits are payable after lapse is equal to the total of premiums paid divided by the daily benefit amount on the date of lapse. Any premiums paid which are not paid in benefits as continued coverage will be paid to the beneficiary upon the insured's death. If the policy lapses due to death of the insured and has not previously lapsed for nonpayment of premium, the total of premiums paid, with no deduction for benefits paid, will be paid to the beneficiary. Under joint coverage, benefits payable upon death will be paid upon the last to die.	Not Available	Available
Limited Continuation of Coverage Benefit Rider	This rider provides a nonforfeiture benefit with a claims offset in the event of policy lapse. The same benefit is provided for continued coverage after lapse due to nonpayment of premium as under the Full Continuation of Coverage Benefit Rider described above. If the policy lapses due to death of the insured and has not previously lapsed for nonpayment of premium, the total of premiums paid, reduced by the total of benefits received, will be paid to the beneficiary. Under joint coverage, benefits payable upon death will be paid upon the last to die.	Not Available	Available
10- Year Premium Payment Endorsement	Premiums payable over a 10 year period, after which no further premium is due.	Not Available	Available

John Alden Life Insurance Company
Rate Increase Impact Exhibit
Attachment A1

Nationwide				
	Cost of Living Adjustment			Total
	None	Compound	Simple	
	J-5762-P			
Number of Policies	494	684	20	1,198
Current Premium	\$729,341	\$1,398,200	\$27,314	2,154,855
Current AveragePremium	\$1,476	\$2,044	\$1,366	1,799
New Premium	\$1,260,301	\$2,416,089	\$47,199	3,723,589
New Average Premium	\$2,551	\$3,532	\$2,360	3,108
Average Rate Increase	72.80%	72.80%	72.80%	72.80%
	J-5875-P			
Number of Policies	781	1,199	1,121	3,101
Current Premium	\$1,230,728	\$2,681,621	\$2,482,639	6,394,988
Current AveragePremium	\$1,576	\$2,237	\$2,215	2,062
New Premium	\$2,126,699	\$4,633,842	\$4,290,000	11,050,540
New Average Premium	\$2,723	\$3,865	\$3,827	3,564
Average Rate Increase	72.80%	72.80%	72.80%	72.80%
	Combined			
Number of Policies	1,275	1,883	1,141	4,299
Current Premium	\$1,960,069	\$4,079,821	\$2,509,953	8,549,843
Current AveragePremium	\$1,537	\$2,167	\$2,200	1,989
New Premium	\$3,386,999	\$7,049,930	\$4,337,199	14,774,129
New Average Premium	\$2,656	\$3,744	\$3,801	3,437
Average Rate Increase	72.80%	72.80%	72.80%	72.80%

Pennsylvania				
	Cost of Living Adjustment			Total
	None	Compound	Simple	
	J-5762-P			
Number of Policies	15	10	0	25
Current Premium	\$24,499	\$22,825	\$0	47,323
Current AveragePremium	\$1,633	\$2,282	\$0	1,893
New Premium	\$42,333	\$39,441	\$0	81,775
New Average Premium	\$2,822	\$3,944	\$0	3,271
Average Rate Increase	72.80%	72.80%	0.00%	72.80%
	J-5875-P			
Number of Policies	26	35	58	119
Current Premium	\$53,458	\$95,640	\$148,364	297,462
Current AveragePremium	\$2,056	\$2,733	\$2,558	2,500
New Premium	\$92,375	\$165,266	\$256,373	514,014
New Average Premium	\$3,553	\$4,722	\$4,420	4,319
Average Rate Increase	72.80%	72.80%	72.80%	72.80%
	Combined			
Number of Policies	41	45	58	144
Current Premium	\$77,956	\$118,465	\$148,364	344,785
Current AveragePremium	\$1,901	\$2,633	\$2,558	2,394
New Premium	\$134,709	\$204,707	\$256,373	595,789
New Average Premium	\$3,286	\$4,549	\$4,420	4,137
Average Rate Increase	72.80%	72.80%	72.80%	72.80%

John Alden Life Insurance Company

Policy Form: J-5762-P

Exhibit B1

Rates and Factors After Proposed Increase (3 Phases of 20% Each)

Individual / Standard Risk / Lifetime Benefit Period / 90 Day Elimination Period

Issue Age	LTNC Level Premium Per \$10 Daily Benefit			Benefit Increase Factors Compound	Other Riders	
	1st Phase	2nd Phase	3rd Phase		Limited SB/COC	Full SB/COC
40	49.68	59.61	71.53	2.45	1.20	1.260
41	52.17	62.60	75.12	2.45	1.21	1.273
42	54.64	65.56	78.67	2.45	1.22	1.286
43	57.13	68.55	82.26	2.45	1.23	1.299
44	59.61	71.53	85.83	2.45	1.24	1.312
45	62.10	74.52	89.42	2.45	1.25	1.325
46	64.58	77.49	92.98	2.45	1.26	1.338
47	67.07	80.48	96.57	2.45	1.27	1.351
48	69.55	83.46	100.15	2.45	1.28	1.364
49	72.04	86.44	103.72	2.45	1.29	1.377
50	74.52	89.42	107.30	2.45	1.30	1.390
51	78.24	93.88	112.65	2.40	1.31	1.403
52	81.97	98.36	118.03	2.35	1.32	1.416
53	85.69	102.82	123.38	2.30	1.33	1.429
54	89.42	107.30	128.76	2.25	1.34	1.442
55	93.15	111.78	134.13	2.20	1.35	1.455
56	100.59	120.70	144.84	2.16	1.36	1.468
57	108.05	129.66	155.59	2.12	1.37	1.481
58	115.50	138.60	166.32	2.08	1.38	1.494
59	122.96	147.55	177.06	2.04	1.39	1.507
60	130.40	156.48	187.77	2.00	1.40	1.520
61	145.31	174.37	209.24	1.96	1.41	1.533
62	160.21	192.25	230.70	1.92	1.42	1.546
63	175.11	210.13	252.15	1.88	1.43	1.559
64	190.02	228.02	273.62	1.84	1.44	1.572
65	204.92	245.90	295.08	1.80	1.45	1.585
66	238.46	286.15	343.38	1.77	1.46	1.598
67	272.00	326.40	391.68	1.74	1.47	1.611
68	305.53	366.63	439.95	1.71	1.48	1.624
69	339.06	406.87	488.24	1.68	1.49	1.637
70	372.60	447.12	536.54	1.65	1.50	1.650
71	440.91	529.09	634.90	1.62	1.51	1.663
72	509.22	611.06	733.27	1.59	1.52	1.676
73	577.52	693.02	831.62	1.56	1.53	1.689
74	645.84	775.00	930.00	1.53	1.54	1.702
75	714.15	856.98	1,028.37	1.50	1.55	1.715
76	807.30	968.76	1,162.51	1.47	1.56	1.728
77	900.44	1,080.52	1,296.62	1.44	1.57	1.741
78	993.60	1,192.32	1,430.78	1.41	1.58	1.754
79	1,086.75	1,304.10	1,564.92	1.38	1.59	1.767
80	1,179.90	1,415.88	1,699.05	1.35	1.60	1.780
81	1,266.84	1,520.20	1,824.24	1.32	1.61	1.793
82	1,353.78	1,624.53	1,949.43	1.29	1.62	1.806
83	1,440.72	1,728.86	2,074.63	1.26	1.63	1.819
84	1,527.66	1,833.19	2,199.82	1.23	1.64	1.832
Issue Age Independent Factors						
Risk Classes		Elimination Period		Payment Mode		
Preferred	0.70	0-Day	1.50	Annual	1.00	
Standard	1.00	30-Day	1.30	Semi-Annual	0.52	
Substandard1	1.25	90-Day	1.00	Quarterly	0.27	
Substandard2	1.50	180-Day	0.80	Monthly	0.10	
Non-level Premium Factor		HHC Benefit Rider Elimination & Premium Factor		Other Factors		
First Year	2.000	0 Visits (50%)	0.75	Joint Factor	1.50	
Renewal Years	0.667	0 Visits (100%)	1.50	3-Yr Benefit Period	0.70	
		30 Visits (50%)	0.65	Group Discount	0.10	
		30 Visits (100%)	1.30	First Day of Coverage	1.25	

John Alden Life Insurance Company
Policy Form: J-5875-P
Exhibit B2
Rates and Factors After Proposed Increase (3 Phases of 20% Each)
Individual / Standard Risk / Lifetime Benefit Period / 90 Day Elimination Period

Issue Age	LTNC Level Premium Per \$10 Daily Benefit			HCBC Reimbursement Premium			HCBC Indemnity Premium			Benefit Increase Factors		Other Riders			
	1st Phase	2nd Phase	3rd Phase	1st Phase	2nd Phase	3rd Phase	1st Phase	2nd Phase	3rd Phase	Compound	Simple	10-Pay Factor	Limited COC Factor	Full COC Factor	SBP Factor
40	43.47	52.16	62.59	34.77	41.72	50.06	43.47	52.16	62.59	2.45	1.80	1.90	1.244	1.330	1.122
41	45.63	54.75	65.70	36.51	43.81	52.57	45.63	54.75	65.70	2.45	1.80	1.89	1.252	1.340	1.126
42	47.82	57.38	68.85	38.26	45.91	55.09	47.82	57.38	68.85	2.45	1.80	1.88	1.259	1.350	1.130
43	49.99	59.98	71.97	39.98	47.97	57.56	49.99	59.98	71.97	2.45	1.80	1.87	1.267	1.360	1.134
44	52.17	62.60	75.12	41.73	50.07	60.08	52.17	62.60	75.12	2.45	1.80	1.86	1.274	1.370	1.137
45	54.33	65.19	78.22	43.47	52.16	62.59	54.33	65.19	78.22	2.45	1.80	1.85	1.281	1.380	1.141
46	56.52	67.82	81.38	45.21	54.25	65.10	56.52	67.82	81.38	2.45	1.80	1.84	1.289	1.390	1.145
47	58.69	70.42	84.50	46.94	56.32	67.58	58.69	70.42	84.50	2.45	1.80	1.83	1.296	1.400	1.148
48	60.85	73.02	87.62	48.68	58.41	70.09	60.85	73.02	87.62	2.45	1.80	1.82	1.304	1.410	1.152
49	63.02	75.62	90.74	50.42	60.50	72.60	63.02	75.62	90.74	2.45	1.80	1.81	1.311	1.420	1.156
50	65.21	78.25	93.90	52.17	62.60	75.12	65.21	78.25	93.90	2.45	1.80	1.80	1.319	1.430	1.160
51	68.47	82.16	98.59	54.77	65.72	78.86	68.47	82.16	98.59	2.40	1.78	1.79	1.326	1.440	1.163
52	71.72	86.06	103.27	57.38	68.85	82.62	71.72	86.06	103.27	2.35	1.76	1.78	1.333	1.450	1.167
53	74.99	89.98	107.97	60.00	72.00	86.40	74.99	89.98	107.97	2.30	1.74	1.77	1.344	1.465	1.172
54	78.24	93.88	112.65	62.59	75.10	90.12	78.24	93.88	112.65	2.25	1.72	1.76	1.356	1.480	1.178
55	81.51	97.81	117.37	65.21	78.25	93.90	81.51	97.81	117.37	2.20	1.70	1.75	1.367	1.495	1.184
56	88.02	105.62	126.74	70.43	84.51	101.41	88.02	105.62	126.74	2.16	1.68	1.73	1.378	1.510	1.189
57	94.56	113.47	136.16	75.64	90.76	108.91	94.56	113.47	136.16	2.12	1.66	1.71	1.389	1.525	1.195
58	101.08	121.29	145.54	80.87	97.04	116.44	101.08	121.29	145.54	2.08	1.64	1.69	1.400	1.540	1.200
59	107.61	129.13	154.95	86.08	103.29	123.94	107.61	129.13	154.95	2.04	1.62	1.67	1.411	1.555	1.206
60	114.12	136.94	164.32	91.29	109.54	131.44	114.12	136.94	164.32	2.00	1.60	1.65	1.422	1.570	1.211
61	129.71	155.65	186.78	103.76	124.51	149.41	129.71	155.65	186.78	1.96	1.58	1.63	1.433	1.585	1.217
62	145.31	174.37	209.24	116.25	139.50	167.40	145.31	174.37	209.24	1.92	1.56	1.61	1.444	1.600	1.222
63	160.93	193.11	231.73	128.75	154.50	185.40	160.93	193.11	231.73	1.88	1.54	1.59	1.467	1.630	1.234
64	176.52	211.82	254.18	141.22	169.46	203.35	176.52	211.82	254.18	1.84	1.52	1.57	1.489	1.660	1.245
65	192.11	230.53	276.63	153.69	184.42	221.30	192.11	230.53	276.63	1.80	1.50	1.55	1.511	1.690	1.256
66	218.90	262.68	315.21	175.11	210.13	252.15	218.90	262.68	315.21	1.77	1.48	1.53	1.533	1.720	1.267
67	245.67	294.80	353.76	196.54	235.84	283.00	245.67	294.80	353.76	1.74	1.46	1.51	1.556	1.750	1.278
68	272.46	326.95	392.34	217.97	261.56	313.87	272.46	326.95	392.34	1.71	1.44	1.49	1.578	1.780	1.289
69	299.24	359.08	430.89	239.38	287.25	344.70	299.24	359.08	430.89	1.68	1.42	1.47	1.600	1.810	1.300
70	326.03	391.23	469.47	260.82	312.98	375.57	326.03	391.23	469.47	1.65	1.40	1.45	1.622	1.840	1.311
71	376.87	452.24	542.68	301.49	361.78	434.13	376.87	452.24	542.68	1.62	1.38	1.43	1.644	1.870	1.322
72	427.70	513.24	615.88	342.17	410.60	492.72	427.70	513.24	615.88	1.59	1.36	1.41	1.667	1.900	1.334
73	478.56	574.27	689.12	382.85	459.42	551.30	478.56	574.27	689.12	1.56	1.34	1.39	1.681	1.920	1.341
74	529.40	635.28	762.33	423.51	508.21	609.85	529.40	635.28	762.33	1.53	1.32	1.37	1.696	1.940	1.348
75	580.24	696.28	835.53	464.19	557.02	668.42	580.24	696.28	835.53	1.50	1.30	1.35	1.711	1.960	1.356
76	670.68	804.81	965.77	536.54	643.84	772.60	670.68	804.81	965.77	1.47	1.28	1.33	1.726	1.980	1.363
77	761.11	913.33	1,095.99	608.88	730.65	876.78	761.11	913.33	1,095.99	1.44	1.26	1.31	1.741	2.000	1.371
78	851.52	1,021.82	1,226.18	681.22	817.46	980.95	851.52	1,021.82	1,226.18	1.41	1.24	1.29	1.748	2.010	1.374
79	941.97	1,130.36	1,356.43	753.58	904.29	1,085.14	941.97	1,130.36	1,356.43	1.38	1.22	1.27	1.756	2.020	1.378
80	1,032.42	1,238.90	1,486.68	825.92	991.10	1,189.32	1,032.42	1,238.90	1,486.68	1.35	1.20	1.25	1.763	2.030	1.382
81	1,122.85	1,347.42	1,616.90	898.28	1,077.93	1,293.51	1,122.85	1,347.42	1,616.90	1.32	1.19	1.23	1.770	2.040	1.385
82	1,213.27	1,455.92	1,747.10	970.61	1,164.73	1,397.67	1,213.27	1,455.92	1,747.10	1.29	1.18	1.21	1.778	2.050	1.389
83	1,303.70	1,564.44	1,877.32	1,042.96	1,251.55	1,501.86	1,303.70	1,564.44	1,877.32	1.26	1.17	1.19	1.785	2.060	1.393
84	1,394.15	1,672.98	2,007.57	1,115.32	1,338.38	1,606.05	1,394.15	1,672.98	2,007.57	1.23	1.16	1.17	1.793	2.070	1.397
Issue Age Independent Factors															
Risk Classes		Elimination Period		Payment Mode		Benefit Period		Other Factors							
Accept	0.80	0-Day	1.30	Annual	1.00	2-Year	0.60	Joint Factor	1.50						
Standard	1.00	30-Day	1.15	Semi-Annual	0.52	3-Year	0.70	ALF Benefit Rider	1.14						
Substandard	1.20	90-Day	1.00	Quarterly	0.27	4-Year	0.80								
		180-Day	0.90	Monthly	0.085										
Non-level Premium Factor		Endorsed Group Discount													
First Year	2.00	Ages 40-64	0.15												
Renewal Years	0.75	Ages 65+	0.10												

John Alden Life Insurance Company
Combined Reinsurer Experience
Exhibit C
Lapse Actual to Expected (Best Estimate) Analysis

Duration	Exposure*	Lapses	Actual Lapse Rates	Best Estimate Lapse Rates	A/E
20	34,751	253	0.73%	0.75%	0.97
21	27,299	201	0.74%	0.75%	0.98
22	18,674	118	0.63%	0.75%	0.84
23	11,840	85	0.72%	0.75%	0.96
24	6,834	53	0.78%	0.75%	1.03
25	3,461	23	0.66%	0.75%	0.89
26	1,537	9	0.59%	0.75%	0.78
27	601	6	1.00%	0.75%	1.33
28	296	1	0.34%	0.75%	0.45
29	109	0	0.00%	0.75%	0.00
30	30	0	0.00%	0.75%	0.00
31	7	0	0.00%	0.75%	0.00
Average	105,440	749	0.71%	0.75%	0.95

*All J-5762-P and J-5875-P policies are duration 20+

* Lifetime pay policies only

John Alden Life Insurance Company
Policy Forms: J-5762-P & J-5875-P
Exhibit D1
Mortality Selection Factors

Policy Duration	Selection Factors	
	Single	Joint
1	0.165	0.095
2	0.335	0.135
3	0.390	0.225
4	0.425	0.240
5	0.470	0.280
6	0.485	0.320
7	0.520	0.330
8	0.530	0.370
9	0.600	0.380
10	0.610	0.390
11	0.630	0.410
12	0.670	0.435
13	0.680	0.455
14	0.760	0.490
15	0.800	0.500
16	0.850	0.520
17	0.875	0.590
18	0.925	0.610
19	0.930	0.650
20	0.940	0.680
21	1.000	0.820
22	1.000	0.830
23	1.000	0.930
24	1.000	0.960
25	1.000	1.000

John Alden Life Insurance Company
Combined Reinsurer Experience
Exhibit D2
Mortality A to E Analysis

Attained Age	Single Lives Death Counts			Joint Lives Death Counts**			Total Death Counts		
	Actual	Expected*	A/E	Actual	Expected*	A/E	Actual	Expected*	A/E
<40	1	1	78%	1	2	59%	2	3	68%
40-44	2	4	56%	14	7	201%	16	11	152%
45-49	27	14	192%	55	29	192%	82	43	192%
50-54	67	56	120%	160	114	141%	227	170	134%
55-59	190	196	97%	538	408	132%	728	604	120%
60-64	483	589	82%	1,244	1,219	102%	1,727	1,808	96%
65-69	940	1,288	73%	2,105	2,584	81%	3,045	3,871	79%
70-74	1,608	1,919	84%	3,328	3,733	89%	4,936	5,651	87%
75-79	2,137	2,445	87%	4,216	4,378	96%	6,353	6,823	93%
80-84	2,700	2,639	102%	4,313	4,114	105%	7,013	6,753	104%
85-89	2,302	2,204	104%	3,074	2,607	118%	5,376	4,811	112%
90+	1,798	1,560	115%	1,188	1,018	117%	2,986	2,578	116%
Total	12,255	12,914	95%	20,236	20,212	100%	32,491	33,126	98%

* Expected - 85% of 94 GAM and graded to 100% from ages 85 to 90 with selection

** Joint lives - joint policy at issue

John Alden Life Insurance Company
Policy Forms: J-5762-P & J-5875-P
Exhibit E1
Incidence Rates Per 100

Best Estimate						
Attained Age	Nursing Facility Care Incidence Rates				Incidence Rate Factors	
	Single Male	Single Female	Married Male	Married Female	Home and Community Based Care and Assisted Living Facility	Assisted Living Facility
40	0.0026	0.0028	0.0007	0.0006	1.550	0.300
41	0.0030	0.0032	0.0008	0.0007	1.550	0.300
42	0.0035	0.0038	0.0010	0.0009	1.550	0.300
43	0.0041	0.0044	0.0012	0.0011	1.550	0.300
44	0.0047	0.0052	0.0014	0.0013	1.550	0.300
45	0.0055	0.0061	0.0017	0.0015	1.550	0.300
46	0.0064	0.0071	0.0021	0.0018	1.550	0.300
47	0.0075	0.0083	0.0025	0.0022	1.550	0.300
48	0.0087	0.0097	0.0029	0.0027	1.550	0.300
49	0.0101	0.0113	0.0035	0.0032	1.550	0.300
50	0.0118	0.0132	0.0042	0.0039	1.550	0.300
51	0.0137	0.0154	0.0050	0.0046	1.550	0.300
52	0.0159	0.0180	0.0060	0.0056	1.550	0.300
53	0.0186	0.0210	0.0071	0.0067	1.550	0.300
54	0.0216	0.0245	0.0085	0.0081	1.550	0.300
55	0.0251	0.0287	0.0102	0.0097	1.550	0.300
56	0.0293	0.0335	0.0121	0.0117	1.550	0.300
57	0.0341	0.0391	0.0145	0.0141	1.550	0.300
58	0.0415	0.0478	0.0181	0.0178	1.436	0.290
59	0.0510	0.0589	0.0228	0.0225	1.311	0.290
60	0.0621	0.0721	0.0285	0.0284	1.206	0.280
61	0.0756	0.0880	0.0356	0.0357	1.111	0.270
62	0.0908	0.1061	0.0439	0.0444	1.045	0.270
63	0.1098	0.1287	0.0545	0.0555	0.969	0.260
64	0.1345	0.1582	0.0684	0.0702	0.872	0.260
65	0.1633	0.1927	0.0852	0.0881	0.795	0.250
66	0.1974	0.2339	0.1057	0.1102	0.728	0.240
67	0.2377	0.2826	0.1305	0.1371	0.671	0.240
68	0.2866	0.3420	0.1615	0.1709	0.613	0.230
69	0.3461	0.4144	0.2000	0.2134	0.555	0.230
70	0.4157	0.4995	0.2465	0.2650	0.507	0.220
71	0.4961	0.5982	0.3018	0.3269	0.470	0.220
72	0.5847	0.7075	0.3649	0.3983	0.452	0.210
73	0.6936	0.8422	0.4440	0.4884	0.425	0.210
74	0.8236	1.0036	0.5409	0.5995	0.397	0.200
75	0.9784	1.1964	0.6591	0.7363	0.369	0.200
76	1.1628	1.4269	0.8036	0.9046	0.341	0.190
77	1.3720	1.6896	0.9727	1.1034	0.323	0.190
78	1.6192	2.0010	1.1777	1.3462	0.305	0.190
79	1.8966	2.3521	1.4152	1.6301	0.297	0.180
80	2.2390	2.7864	1.7138	1.9893	0.279	0.180
81	2.6436	3.3016	2.0759	2.4283	0.261	0.170
82	3.0972	3.8817	2.4950	2.9409	0.253	0.170
83	3.6725	4.5348	3.0336	3.5246	0.235	0.170
84	4.3102	5.3067	3.7087	4.2518	0.227	0.160
85	5.0083	6.1939	4.5125	5.1104	0.219	0.160
86	5.7272	7.1457	5.4030	6.0464	0.212	0.150
87	6.4312	8.1148	6.3381	7.0025	0.204	0.150
88	7.0601	9.0222	7.2474	7.8861	0.196	0.150
89	7.5431	9.8230	7.8922	8.6499	0.188	0.140
90	8.2042	10.5318	8.5281	9.3379	0.180	0.140
91	8.7992	11.1727	9.1153	9.9693	0.182	0.140
92	9.4722	11.9131	9.7871	10.6917	0.174	0.130
93	10.1544	12.6738	10.4817	11.4358	0.166	0.130
94	10.7441	13.3384	11.0444	12.0975	0.169	0.130
95	11.3403	14.0218	11.7481	12.7790	0.171	0.130
96	11.9483	14.7114	12.4221	13.4600	0.163	0.120
97	12.5690	15.4077	13.0942	14.1425	0.166	0.120
98	13.1995	16.1053	13.7757	14.8293	0.168	0.120
99	13.8403	16.8018	14.4581	15.5210	0.171	0.110
100	14.4913	17.5085	15.1407	16.2189	0.174	0.110
101	15.1524	18.2256	15.8234	16.9220	0.176	0.110
102	15.8234	18.9527	16.5061	17.6301	0.179	0.110
103	16.5044	19.6898	17.1888	18.3432	0.181	0.100
104	17.1854	20.4369	17.8715	19.0613	0.184	0.100
105	17.8664	21.1940	18.5542	19.7844	0.187	0.100
106	18.5474	21.9511	19.2369	20.5125	0.189	0.100
107	19.2284	22.7082	19.9196	21.2406	0.192	0.100
108	19.9094	23.4653	20.6023	21.9687	0.195	0.100
109	20.5904	24.2224	21.2850	22.6968	0.197	0.100
110	21.2714	24.9795	21.9677	23.4249	0.200	0.100

John Alden Life Insurance Company
Policy Forms: J-5762-P & J-5875-P
Exhibit E2
Length of Stay Per \$1 of Daily Benefit

Best Estimate Length of Stay *				
Attained Age	Male		Female	
	No COLA	5% Compound COLA	No COLA	5% Compound COLA
40	510.60	669.38	556.93	706.48
41	510.60	669.38	556.93	706.48
42	510.60	669.38	556.93	706.48
43	510.60	669.38	556.93	706.48
44	510.60	669.38	556.93	706.48
45	510.60	669.38	556.93	706.48
46	510.60	669.38	556.93	706.48
47	510.60	669.38	556.93	706.48
48	510.60	669.38	556.93	706.48
49	510.60	669.38	556.93	706.48
50	510.60	669.38	556.93	706.48
51	510.60	669.38	556.93	706.48
52	510.60	669.38	556.93	706.48
53	506.31	661.90	536.81	675.39
54	502.20	654.75	518.29	647.25
55	498.25	647.94	501.17	621.63
56	494.47	641.44	485.24	598.17
57	490.83	635.24	470.37	576.56
58	487.34	629.32	456.41	556.57
59	483.99	623.67	443.26	537.98
60	480.77	618.27	430.84	520.62
61	477.68	613.13	419.06	504.35
62	474.70	608.22	407.86	489.04
63	475.43	593.05	436.64	524.28
64	480.60	587.46	468.08	563.44
65	489.10	588.47	502.66	607.56
66	500.26	594.32	541.09	658.19
67	513.68	603.89	584.39	717.71
68	505.55	588.63	606.96	738.67
69	499.22	576.50	631.40	762.39
70	494.31	566.77	657.70	788.75
71	490.55	558.96	685.89	817.66
72	487.72	552.68	715.98	849.10
73	488.58	550.11	722.19	849.87
74	490.55	549.68	730.00	854.29
75	493.29	550.58	738.90	860.99
76	496.60	552.42	748.64	869.21
77	500.37	554.95	759.04	878.57
78	502.58	556.05	763.54	881.06
79	505.09	557.55	768.49	884.19
80	507.88	559.42	773.87	887.93
81	510.93	561.64	779.68	892.27
82	514.24	564.18	785.92	897.23
83	503.58	550.16	774.77	878.83
84	494.10	537.86	765.75	864.14
85	485.55	526.89	758.19	851.88
86	477.75	516.98	751.74	841.38
87	470.58	507.94	746.17	832.22
88	455.63	490.14	711.00	788.00
89	442.03	474.05	679.70	749.24
90	429.60	459.44	651.51	714.77
91	418.17	446.08	625.89	683.77
92	407.63	433.83	602.47	655.67
93	407.63	433.83	602.47	655.67
94	407.63	433.83	602.47	655.67
95	407.63	433.83	602.47	655.67
96	407.63	433.83	602.47	655.67
97	407.63	433.83	602.47	655.67
98	407.63	433.83	602.47	655.67
99	407.63	433.83	602.47	655.67
100	407.63	433.83	602.47	655.67
101	407.63	433.83	602.47	655.67
102	407.63	433.83	602.47	655.67
103	407.63	433.83	602.47	655.67
104	407.63	433.83	602.47	655.67
105	407.63	433.83	602.47	655.67
106	407.63	433.83	602.47	655.67
107	407.63	433.83	602.47	655.67
108	407.63	433.83	602.47	655.67
109	407.63	433.83	602.47	655.67
110	407.63	433.83	602.47	655.67

* Based on SOA LTC Intercompany 2000-2011 Study and reinsurer's experiences. 4.5% interest. Lifetime Benefits, 90 Day Elimination Period

Combined Reinsurer Experience
Exhibit E3
Incidence A to E Analysis

Attained Age	Single Male				Single Female			
	Exposure	Claim Count	Expected Claim Count	A/E	Exposure	Claim Count	Expected Claim Count	A/E
40-44	1,302	0	0	0%	1,624	0	0	0%
45-49	4,044	5	1	601%	6,238	8	1	555%
50-54	9,506	6	4	144%	18,059	24	9	266%
55-59	20,377	36	19	191%	44,051	66	47	140%
60-64	33,982	72	66	109%	80,901	204	185	110%
65-69	43,918	178	180	99%	110,101	546	538	102%
70-74	41,786	355	357	99%	108,868	1,118	1,131	99%
75-79	29,031	530	523	101%	80,590	1,815	1,798	101%
80-84	15,764	617	598	103%	47,645	2,280	2,261	101%
85-89	5,955	439	434	101%	20,500	1,867	1,869	100%
90+	1,500	163	163	100%	6,111	871	773	113%
Total	207,166	2,401	2,345	102%	524,690	8,799	8,613	102%

Attained Age	Married Male				Married Female			
	Exposure	Claim Count	Expected Claim Count	A/E	Exposure	Claim Count	Expected Claim Count	A/E
40-44	4,250	0	0	0%	7,609	7	0	3670%
45-49	14,544	5	1	495%	23,203	16	1	1104%
50-54	38,365	22	6	342%	56,521	46	9	520%
55-59	91,380	80	37	218%	120,731	124	47	264%
60-64	168,363	229	161	142%	197,198	287	190	151%
65-69	222,945	512	505	101%	226,512	546	536	102%
70-74	204,081	1,043	1,091	96%	184,105	1,024	1,068	96%
75-79	130,981	1,737	1,665	104%	109,951	1,585	1,581	100%
80-84	61,107	1,855	1,847	100%	49,229	1,793	1,729	104%
85-89	19,205	1,342	1,333	101%	14,498	1,105	1,104	100%
90+	1,670	223	175	127%	2,455	300	269	111%
Total	956,890	7,048	6,821	103%	992,013	6,833	6,535	105%

John Alden Life Insurance Company
Combined Reinsurer Experience
Exhibit E4
Claim Termination A to E Analysis

Duration	Claim Exposure	Actual	Expected	A/E
1st quarter	1,946	524	627	84%
2nd quarter	4,726	749	651	115%
3rd quarter	4,010	362	379	96%
4th quarter	3,570	278	283	98%
2	12,547	2,953	3,128	94%
3	8,650	2,090	2,327	90%
4	5,877	1,860	1,766	105%
5	3,552	934	1,074	87%
6	2,305	557	656	85%
7	1,542	361	451	80%
8	1,036	234	286	82%
9	707	158	188	84%
10	478	109	145	75%
11	321	74	88	84%
12	209	53	73	73%
13	123	22	46	48%
14	85	42	25	166%
15	59	26	20	133%
16	38	15	8	188%
17	26	10	5	190%
18	17	6	2	314%
19	11	2	1	150%
20	6	1	1	138%
21	3	1	0	241%
Average	51,843	11,422	12,230	93%

John Alden Life Insurance Company
Nationwide Experience Projection
Policy Forms: J-5762-P and J-5875-P Combined
Exhibit F

		Before Proposed Rate Increase			With Proposed Rate Increase*		
		Earned Premium	Incurred Claims	Loss Ratio	Earned Premium	Incurred Claims*	Loss Ratio
Historical Experience	1992	25,360	0	0.0%	25,360	0	0.0%
	1993	746,128	136,808	18.3%	746,128	136,808	18.3%
	1994	2,295,491	8,756	0.4%	2,295,491	8,756	0.4%
	1995	6,029,427	533,026	8.8%	6,029,427	533,026	8.8%
	1996	9,649,677	754,308	7.8%	9,649,677	754,308	7.8%
	1997	17,125,508	885,971	5.2%	17,125,508	885,971	5.2%
	1998	16,734,963	2,005,950	12.0%	16,734,963	2,005,950	12.0%
	1999	16,179,464	3,176,941	19.6%	16,179,464	3,176,941	19.6%
	2000	17,308,264	3,153,971	18.2%	17,308,264	3,153,971	18.2%
	2001	16,391,917	6,167,067	37.6%	16,391,917	6,167,067	37.6%
	2002	15,107,651	6,089,682	40.3%	15,107,651	6,089,682	40.3%
	2003	14,691,168	8,303,099	56.5%	14,691,168	8,303,099	56.5%
	2004	14,005,972	9,891,733	70.6%	14,005,972	9,891,733	70.6%
	2005	14,109,360	8,430,323	59.7%	14,109,360	8,430,323	59.7%
	2006	13,186,553	10,245,618	77.7%	13,186,553	10,245,618	77.7%
	2007	12,332,679	13,115,913	106.4%	12,332,679	13,115,913	106.4%
	2008	11,823,815	14,918,705	126.2%	11,823,815	14,918,705	126.2%
	2009	12,330,008	19,953,802	161.8%	12,330,008	19,953,802	161.8%
	2010	12,163,149	17,518,262	144.0%	12,163,149	17,518,262	144.0%
	2011	11,602,563	19,970,616	172.1%	11,602,563	19,970,616	172.1%
	2012	11,562,075	20,090,702	173.8%	11,562,075	20,090,702	173.8%
	2013	11,432,042	18,053,996	157.9%	11,432,042	18,053,996	157.9%
2014	10,845,248	26,792,968	247.0%	10,845,248	26,792,968	247.0%	
2015	10,316,362	27,546,959	267.0%	10,316,362	27,546,959	267.0%	
2016	9,619,859	35,666,988	370.8%	9,619,859	35,666,988	370.8%	
2017	9,377,005	27,034,156	288.3%	9,377,005	27,034,156	288.3%	
2018	9,113,229	27,312,814	299.7%	9,113,229	27,312,814	299.7%	
2019	8,503,798	26,005,569	305.8%	8,503,798	26,005,569	305.8%	
2020	8,025,194	27,582,187	343.7%	8,025,194	27,582,187	343.7%	
Projected Future Experience	2021	7,320,695	26,485,335	361.8%	7,320,695	26,485,335	361.8%
	2022	6,311,212	25,916,932	410.6%	7,156,031	25,172,105	351.8%
	2023	5,437,797	25,165,084	462.8%	7,292,368	24,061,473	330.0%
	2024	4,680,824	24,265,092	518.4%	7,441,023	22,895,294	307.7%
	2025	4,023,234	23,265,311	578.3%	6,395,664	21,951,953	343.2%
	2026	3,451,308	22,170,206	642.4%	5,486,483	20,918,668	381.3%
	2027	2,953,344	21,004,162	711.2%	4,694,879	19,818,449	422.1%
	2028	2,519,621	19,814,229	786.4%	4,005,396	18,695,689	466.8%
	2029	2,141,931	18,594,530	868.1%	3,404,990	17,544,844	515.3%
	2030	1,813,549	17,340,353	956.2%	2,882,968	16,361,467	567.5%
	2031	1,528,769	16,119,198	1054.4%	2,430,257	15,209,247	625.8%
	2032	1,282,466	14,898,812	1161.7%	2,038,714	14,057,754	689.5%
	2033	1,070,204	13,680,782	1278.3%	1,701,285	12,908,484	758.7%
	2034	888,163	12,477,962	1404.9%	1,411,897	11,773,564	833.9%
	2035	732,858	11,274,050	1538.4%	1,165,011	10,637,614	913.1%
	2036	601,134	10,119,390	1683.4%	955,613	9,548,137	999.2%
	2037	490,019	9,022,614	1841.3%	778,975	8,513,275	1092.9%
	2038	396,852	7,974,489	2009.4%	630,868	7,524,318	1192.7%
	2039	319,266	6,999,488	2192.4%	507,531	6,604,357	1301.3%
	2040	255,079	6,085,946	2385.9%	405,495	5,742,386	1416.1%
	2041	202,389	5,260,824	2599.4%	321,734	4,963,844	1542.8%
	2042	159,442	4,518,217	2833.8%	253,463	4,263,157	1682.0%
	2043	124,705	3,841,533	3080.5%	198,242	3,624,674	1828.4%
	2044	96,839	3,240,359	3346.1%	153,943	3,057,436	1986.1%
	2045	74,682	2,708,827	3627.1%	118,721	2,555,910	2152.9%
	2046	57,213	2,251,563	3935.4%	90,950	2,124,459	2335.9%
	2047	43,534	1,858,642	4269.4%	69,205	1,753,719	2534.1%
	2048	32,911	1,514,440	4601.6%	52,318	1,428,948	2731.3%
	2049	24,733	1,224,631	4951.5%	39,317	1,155,498	2938.9%
	2050	18,483	987,144	5340.7%	29,383	931,418	3169.9%
	2051	13,738	796,199	5795.5%	21,839	751,253	3439.9%
	2052	10,161	639,962	6298.5%	16,152	603,836	3738.5%
	2053	7,483	513,483	6861.9%	11,896	484,496	4072.9%
2054	5,492	413,636	7532.0%	8,730	390,286	4470.6%	
2055	4,016	332,876	8289.0%	6,384	314,085	4919.9%	
2056	2,925	267,749	9154.9%	4,649	252,634	5433.8%	
2057	2,122	214,254	10095.9%	3,374	202,159	5992.4%	
2058	1,535	166,307	10834.2%	2,440	156,919	6430.6%	
2059	1,108	127,944	11545.9%	1,762	120,721	6853.0%	
2060	796	99,750	12532.4%	1,265	94,119	7438.5%	
Interest	Past	322,633,928	381,346,890	118.2%	322,633,928	381,346,890	118.2%
	Future	49,102,631	363,652,304	740.6%	69,511,910	345,653,982	497.3%
	Lifetime	371,736,559	744,999,194	200.4%	392,145,838	727,000,872	185.4%
Interest Factor							
	Past w/ int	639,199,803	563,265,571	88.1%	639,199,803	563,265,571	88.1%
	Future w/ int	39,115,382	252,842,008	646.4%	54,058,110	240,986,231	445.8%
	Lifetime w/ int	678,315,185	816,107,579	120.3%	693,257,913	804,251,801	116.0%

* Proposed rate increase: 3 Phases of 20.0% each; projection includes 3% shock lapse rate, 11% benefit reduction, and 2% of adverse selection.

John Alden Life Insurance Company
Pennsylvania Experience Projection
Policy Forms: J-5762-P and J-5875-P Combined
Exhibit G

		Before Proposed Rate Increase			With Proposed Rate Increase*		
		Earned Premium	Incurred Claims	Loss Ratio	Earned Premium	Incurred Claims*	Loss Ratio
Historical Experience	1992	0	0	0.0%	0	0	0.0%
	1993	4,505	0	0.0%	4,505	0	0.0%
	1994	17,333	0	0.0%	17,333	0	0.0%
	1995	61,041	202,693	332.1%	61,041	202,693	332.1%
	1996	164,553	72,907	44.3%	164,553	72,907	44.3%
	1997	481,040	190,115	39.5%	481,040	190,115	39.5%
	1998	541,312	26,968	5.0%	541,312	26,968	5.0%
	1999	582,190	0	0.0%	582,190	0	0.0%
	2000	605,639	584	0.1%	605,639	584	0.1%
	2001	576,569	17,600	3.1%	576,569	17,600	3.1%
	2002	536,178	130,495	24.3%	536,178	130,495	24.3%
	2003	519,265	3,063	0.6%	519,265	3,063	0.6%
	2004	505,141	141,554	28.0%	505,141	141,554	28.0%
	2005	508,997	73,827	14.5%	508,997	73,827	14.5%
	2006	485,418	630,940	130.0%	485,418	630,940	130.0%
	2007	454,789	130,120	28.6%	454,789	130,120	28.6%
	2008	426,121	872,979	204.9%	426,121	872,979	204.9%
	2009	451,632	239,134	52.9%	451,632	239,134	52.9%
	2010	393,150	378,493	96.3%	393,150	378,493	96.3%
	2011	369,644	976,199	264.1%	369,644	976,199	264.1%
	2012	393,195	130,426	33.2%	393,195	130,426	33.2%
	2013	391,408	277,957	71.0%	391,408	277,957	71.0%
2014	374,329	171,237	45.7%	374,329	171,237	45.7%	
2015	359,339	82,811	23.0%	359,339	82,811	23.0%	
2016	345,691	1,388,088	401.5%	345,691	1,388,088	401.5%	
2017	353,027	536,561	152.0%	353,027	536,561	152.0%	
2018	371,535	115,440	31.1%	371,535	115,440	31.1%	
2019	353,686	545,232	154.2%	353,686	545,232	154.2%	
2020	315,511	1,855,400	588.1%	315,511	1,855,400	588.1%	
Projected Future Experience	2021	294,224	806,809	274.2%	294,224	806,809	274.2%
	2022	255,819	795,330	310.9%	290,063	772,473	266.3%
	2023	222,328	779,457	350.6%	298,153	745,274	250.0%
	2024	193,095	755,641	391.3%	306,960	712,984	232.3%
	2025	167,542	728,111	434.6%	266,338	687,008	257.9%
	2026	145,121	699,776	482.2%	230,696	660,273	286.2%
	2027	125,428	664,921	530.1%	199,391	627,385	314.7%
	2028	108,109	634,333	586.8%	171,859	598,524	348.3%
	2029	92,798	602,008	648.7%	147,519	568,023	385.1%
	2030	79,301	561,773	708.4%	126,064	530,060	420.5%
	2031	67,489	520,698	771.5%	107,286	491,304	457.9%
	2032	57,161	479,984	839.7%	90,867	452,888	498.4%
	2033	48,155	443,659	921.3%	76,550	418,614	546.8%
	2034	40,319	409,530	1015.7%	64,095	386,411	602.9%
	2035	33,562	373,522	1112.9%	53,353	352,436	660.6%
	2036	27,773	340,986	1227.8%	44,150	321,737	728.7%
	2037	22,824	311,475	1364.7%	36,284	293,892	810.0%
	2038	18,621	282,277	1515.9%	29,601	266,342	899.8%
	2039	15,085	252,456	1673.5%	23,981	238,204	993.3%
	2040	12,135	225,614	1859.3%	19,290	212,878	1103.6%
	2041	9,681	201,562	2082.0%	15,390	190,184	1235.8%
	2042	7,658	173,799	2269.4%	12,174	163,988	1347.0%
	2043	6,010	145,393	2419.1%	9,554	137,185	1435.8%
	2044	4,676	122,104	2611.3%	7,433	115,211	1549.9%
	2045	3,603	99,655	2765.8%	5,728	94,029	1641.7%
	2046	2,748	81,088	2950.8%	4,368	76,510	1751.5%
	2047	2,071	65,791	3176.4%	3,293	62,077	1885.3%
	2048	1,542	52,782	3422.2%	2,452	49,802	2031.3%
	2049	1,133	41,765	3686.0%	1,801	39,408	2187.8%
	2050	822	32,085	3901.8%	1,307	30,274	2315.9%
	2051	589	24,215	4114.2%	936	22,848	2442.0%
	2052	415	17,796	4288.2%	660	16,792	2545.2%
	2053	288	12,813	4443.5%	458	12,090	2637.4%
2054	197	9,074	4602.3%	313	8,562	2731.7%	
2055	132	6,312	4771.3%	210	5,956	2832.0%	
2056	87	4,302	4934.2%	139	4,059	2928.7%	
2057	56	2,858	5115.7%	89	2,697	3036.4%	
2058	35	1,853	5261.7%	56	1,749	3123.1%	
2059	22	1,173	5425.0%	34	1,107	3220.0%	
2060	13	720	5608.5%	20	679	3328.9%	
Interest	Past	10,942,238	9,190,821	84.0%	10,942,238	9,190,821	84.0%
	Future	2,068,668	11,765,500	568.7%	2,943,141	11,178,726	379.8%
	Lifetime	13,010,905	20,956,322	161.1%	13,885,378	20,369,547	146.7%
Interest Factor							
	Past w/ int	20,862,371	13,582,288	65.1%	20,862,371	13,582,288	65.1%
	Future w/ int	1,635,335	8,095,205	495.0%	2,271,344	7,712,179	339.5%
	Lifetime w/ int	22,497,706	21,677,493	96.4%	23,133,715	21,294,467	92.0%

* Proposed rate increase: 3 Phases of 20.0% each; projection includes 3% shock lapse rate, 11% benefit reduction, and 2% of adverse selection.

John Alden Life Insurance Company
Nationwide Experience Projection
Policy Form: J-5762-P
Attachment F1

Calendar Year		Before Proposed Rate Increase			With Proposed Rate Increase*			at: 4.70%	
		Earned Premium	Incurred Claims	Loss Ratio	Earned Premium	Incurred Claims	Loss Ratio	Year End 2020	Factor 1.0470
Historical Experience	1992	25,360	0	0.0%	25,360	0	0.0%	28.5	3.7024
	1993	746,128	136,808	18.3%	746,128	136,808	18.3%	27.5	3.5362
	1994	2,295,491	8,756	0.4%	2,295,491	8,756	0.4%	26.5	3.3774
	1995	5,980,381	533,026	8.9%	5,980,381	533,026	8.9%	25.5	3.2258
	1996	6,889,991	478,535	6.9%	6,889,991	478,535	6.9%	24.5	3.0810
	1997	6,523,412	699,642	10.7%	6,523,412	699,642	10.7%	23.5	2.9427
	1998	5,602,496	932,397	16.6%	5,602,496	932,397	16.6%	22.5	2.8106
	1999	5,068,109	2,336,766	46.1%	5,068,109	2,336,766	46.1%	21.5	2.6844
	2000	4,977,691	1,985,692	39.9%	4,977,691	1,985,692	39.9%	20.5	2.5639
	2001	4,723,934	3,460,155	73.2%	4,723,934	3,460,155	73.2%	19.5	2.4488
	2002	4,534,346	1,916,955	42.3%	4,534,346	1,916,955	42.3%	18.5	2.3389
	2003	4,406,370	4,951,837	112.4%	4,406,370	4,951,837	112.4%	17.5	2.2339
	2004	4,058,684	5,994,139	147.7%	4,058,684	5,994,139	147.7%	16.5	2.1336
	2005	3,996,911	3,216,316	80.5%	3,996,911	3,216,316	80.5%	15.5	2.0379
	2006	3,786,738	4,443,427	117.3%	3,786,738	4,443,427	117.3%	14.5	1.9464
	2007	3,652,881	5,721,847	156.6%	3,652,881	5,721,847	156.6%	13.5	1.8590
	2008	3,480,416	5,810,532	166.9%	3,480,416	5,810,532	166.9%	12.5	1.7756
	2009	3,647,125	10,208,184	279.9%	3,647,125	10,208,184	279.9%	11.5	1.6958
	2010	3,602,828	8,504,798	236.1%	3,602,828	8,504,798	236.1%	10.5	1.6197
	2011	3,393,542	7,452,915	219.6%	3,393,542	7,452,915	219.6%	9.5	1.5470
Projected Future Experience	2012	3,328,989	8,651,847	259.9%	3,328,989	8,651,847	259.9%	8.5	1.4776
	2013	3,307,972	8,132,115	245.8%	3,307,972	8,132,115	245.8%	7.5	1.4112
	2014	3,064,829	10,099,682	329.5%	3,064,829	10,099,682	329.5%	6.5	1.3479
	2015	2,906,719	11,019,425	379.1%	2,906,719	11,019,425	379.1%	5.5	1.2874
	2016	2,657,350	17,429,996	655.9%	2,657,350	17,429,996	655.9%	4.5	1.2296
	2017	2,526,862	8,458,698	334.8%	2,526,862	8,458,698	334.8%	3.5	1.1744
	2018	2,420,534	8,751,769	361.6%	2,420,534	8,751,769	361.6%	2.5	1.1217
	2019	2,202,518	7,598,193	345.0%	2,202,518	7,598,193	345.0%	1.5	1.0713
	2020	2,007,540	8,315,027	414.2%	2,007,540	8,315,027	414.2%	0.5	1.0232
	2021	1,788,940	8,174,607	457.0%	1,788,940	8,174,607	457.0%	-0.5	0.9773
	2022	1,479,601	7,649,615	517.0%	1,677,661	7,429,773	442.9%	-1.5	0.9334
	2023	1,223,843	7,077,709	578.3%	1,641,237	6,767,318	412.3%	-2.5	0.8915
	2024	1,012,012	6,492,538	641.5%	1,608,777	6,126,025	380.8%	-3.5	0.8515
	2025	836,193	5,915,922	707.5%	1,329,281	5,581,960	419.9%	-4.5	0.8133
	2026	690,228	5,354,597	775.8%	1,097,243	5,052,322	460.5%	-5.5	0.7768
	2027	569,083	4,829,116	848.6%	904,661	4,556,506	503.7%	-6.5	0.7419
	2028	468,505	4,349,913	928.5%	744,775	4,104,355	551.1%	-7.5	0.7086
	2029	384,993	3,909,451	1015.5%	612,017	3,688,757	602.7%	-8.5	0.6768
	2030	315,727	3,504,479	1110.0%	501,905	3,306,647	658.8%	-9.5	0.6464
	2031	258,349	3,136,513	1214.1%	410,693	2,959,453	720.6%	-10.5	0.6174
	2032	210,856	2,801,522	1328.6%	335,194	2,643,372	788.6%	-11.5	0.5897
	2033	171,594	2,503,105	1458.7%	272,779	2,361,802	865.8%	-12.5	0.5632
	2034	139,216	2,231,956	1603.2%	221,309	2,105,959	951.6%	-13.5	0.5379
	2035	112,566	1,980,506	1759.4%	178,945	1,868,704	1044.3%	-14.5	0.5138
	2036	90,684	1,753,120	1933.2%	144,159	1,654,154	1147.4%	-15.5	0.4907
	2037	72,761	1,540,358	2117.0%	115,668	1,453,403	1256.5%	-16.5	0.4687
	2038	58,126	1,346,933	2317.2%	92,403	1,270,897	1375.4%	-17.5	0.4476
	2039	46,205	1,176,785	2546.9%	73,451	1,110,354	1511.7%	-18.5	0.4275
	2040	36,526	1,013,886	2775.8%	58,065	956,651	1647.6%	-19.5	0.4084
	2041	28,715	865,017	3012.4%	45,648	816,186	1788.0%	-20.5	0.3900
	2042	22,438	729,362	3250.5%	35,670	688,188	1929.3%	-21.5	0.3725
	2043	17,435	609,893	3498.2%	27,715	575,463	2076.3%	-22.5	0.3558
	2044	13,464	508,406	3776.0%	21,404	479,706	2241.2%	-23.5	0.3398
	2045	10,339	420,988	4071.8%	16,436	397,223	2416.8%	-24.5	0.3246
	2046	7,897	347,412	4399.4%	12,553	327,800	2611.3%	-25.5	0.3100
	2047	6,000	285,224	4753.4%	9,539	269,123	2821.4%	-26.5	0.2961
	2048	4,543	230,402	5071.4%	7,222	217,396	3010.1%	-27.5	0.2828
	2049	3,432	185,729	5411.3%	5,456	175,245	3211.8%	-28.5	0.2701
	2050	2,591	150,269	5799.8%	4,119	141,786	3442.4%	-29.5	0.2580
	2051	1,958	121,708	6216.6%	3,112	114,837	3689.9%	-30.5	0.2464
	2052	1,484	98,503	6637.5%	2,359	92,942	3939.6%	-31.5	0.2353
	2053	1,130	81,144	7179.9%	1,797	76,563	4261.6%	-32.5	0.2248
	2054	866	67,949	7845.3%	1,377	64,113	4656.5%	-33.5	0.2147
	2055	668	57,669	8627.3%	1,063	54,414	5120.7%	-34.5	0.2050
	2056	518	49,467	9554.8%	823	46,675	5671.2%	-35.5	0.1958
	2057	402	42,201	10488.1%	640	39,819	6225.2%	-36.5	0.1870
	2058	314	34,413	10969.9%	499	32,470	6511.1%	-37.5	0.1786
	2059	246	26,997	10996.5%	390	25,473	6526.9%	-38.5	0.1706
	2060	192	22,025	11454.9%	306	20,782	6799.0%	-39.5	0.1630
Interest	Past	105,816,147	157,249,480	148.6%	105,816,147	157,249,480	148.6%		
	Future	10,090,642	81,677,409	809.4%	14,007,289	77,829,219	555.6%		
	Lifetime	115,906,789	238,926,890	206.1%	119,823,437	235,078,700	196.2%		
Interest	Factor								
	Past w/ int	229,572,588	245,222,370	106.8%	229,572,588	245,222,370	106.8%		
	Future w/ int	8,212,290	59,444,749	723.9%	11,123,163	56,817,362	510.8%		
	Lifetime w/ int	237,784,878	304,667,119	128.1%	240,695,751	302,039,732	125.5%		

* Proposed rate increase: 3 Phases of 20.0% each; projection includes 3% shock lapse rate, 11% benefit reduction, and 2% of adverse selection.

John Alden Life Insurance Company
Nationwide Experience Projection
Policy Form: J-5875-P
Attachment F2

Calendar Year		Before Proposed Rate Increase			With Proposed Rate Increase*			at:	4.50%	
		Earned Premium	Incurred Claims	Loss Ratio	Earned Premium	Incurred Claims	Loss Ratio	Year End 2020	Factor 1.0450	
Historical Experience	1992	0	0	0.0%	0	0	0.0%	28.5	3.5060	
	1993	0	0	0.0%	0	0	0.0%	27.5	3.3550	
	1994	0	0	0.0%	0	0	0.0%	26.5	3.2106	
	1995	49,046	0	0.0%	49,046	0	0.0%	25.5	3.0723	
	1996	2,759,686	275,773	10.0%	2,759,686	275,773	10.0%	24.5	2.9400	
	1997	10,602,096	186,329	1.8%	10,602,096	186,329	1.8%	23.5	2.8134	
	1998	11,132,467	1,073,553	9.6%	11,132,467	1,073,553	9.6%	22.5	2.6923	
	1999	11,111,355	840,174	7.6%	11,111,355	840,174	7.6%	21.5	2.5763	
	2000	12,330,573	1,168,280	9.5%	12,330,573	1,168,280	9.5%	20.5	2.4654	
	2001	11,667,983	2,706,912	23.2%	11,667,983	2,706,912	23.2%	19.5	2.3592	
	2002	10,573,305	4,172,727	39.5%	10,573,305	4,172,727	39.5%	18.5	2.2576	
	2003	10,284,798	3,351,262	32.6%	10,284,798	3,351,262	32.6%	17.5	2.1604	
	2004	9,947,288	3,897,594	39.2%	9,947,288	3,897,594	39.2%	16.5	2.0674	
	2005	10,112,449	5,214,007	51.6%	10,112,449	5,214,007	51.6%	15.5	1.9783	
	2006	9,399,816	5,802,190	61.7%	9,399,816	5,802,190	61.7%	14.5	1.8932	
	2007	8,679,798	7,394,066	85.2%	8,679,798	7,394,066	85.2%	13.5	1.8116	
	2008	8,343,399	9,108,173	109.2%	8,343,399	9,108,173	109.2%	12.5	1.7336	
	2009	8,682,883	9,745,619	112.2%	8,682,883	9,745,619	112.2%	11.5	1.6590	
	2010	8,560,321	9,013,463	105.3%	8,560,321	9,013,463	105.3%	10.5	1.5875	
	2011	8,209,021	12,517,701	152.5%	8,209,021	12,517,701	152.5%	9.5	1.5192	
	2012	8,233,085	11,438,854	138.9%	8,233,085	11,438,854	138.9%	8.5	1.4537	
	2013	8,124,070	9,921,881	122.1%	8,124,070	9,921,881	122.1%	7.5	1.3911	
2014	7,780,419	16,693,286	214.6%	7,780,419	16,693,286	214.6%	6.5	1.3312		
2015	7,409,642	16,527,534	223.1%	7,409,642	16,527,534	223.1%	5.5	1.2739		
2016	6,962,509	18,236,992	261.9%	6,962,509	18,236,992	261.9%	4.5	1.2191		
2017	6,850,143	18,575,459	271.2%	6,850,143	18,575,459	271.2%	3.5	1.1666		
2018	6,692,694	18,561,044	277.3%	6,692,694	18,561,044	277.3%	2.5	1.1163		
2019	6,301,280	18,407,376	292.1%	6,301,280	18,407,376	292.1%	1.5	1.0683		
2020	6,017,654	19,267,160	320.2%	6,017,654	19,267,160	320.2%	0.5	1.0223		
Projected Future Experience	2021	5,531,755	18,310,729	331.0%	5,531,755	18,310,729	331.0%	-0.5	0.9782	
	2022	4,831,610	18,267,317	378.1%	5,478,370	17,742,332	323.9%	-1.5	0.9361	
	2023	4,213,954	18,087,374	429.2%	5,651,132	17,294,155	306.0%	-2.5	0.8958	
	2024	3,668,812	17,772,554	484.4%	5,832,246	16,769,269	287.5%	-3.5	0.8572	
	2025	3,187,041	17,349,389	544.4%	5,066,383	16,369,993	323.1%	-4.5	0.8203	
	2026	2,761,080	16,815,610	609.0%	4,389,240	15,866,346	361.5%	-5.5	0.7850	
	2027	2,384,261	16,175,046	678.4%	3,790,217	15,261,943	402.7%	-6.5	0.7512	
	2028	2,051,115	15,464,316	753.9%	3,260,622	14,591,334	447.5%	-7.5	0.7188	
	2029	1,756,938	14,685,079	835.8%	2,792,973	13,856,086	496.1%	-8.5	0.6879	
	2030	1,497,823	13,835,874	923.7%	2,381,062	13,054,820	548.3%	-9.5	0.6583	
	2031	1,270,420	12,982,685	1021.9%	2,019,565	12,249,794	606.6%	-10.5	0.6299	
	2032	1,071,610	12,097,290	1128.9%	1,703,519	11,414,382	670.0%	-11.5	0.6028	
	2033	898,611	11,177,677	1243.9%	1,428,505	10,546,682	738.3%	-12.5	0.5768	
	2034	748,947	10,246,006	1368.1%	1,190,588	9,667,605	812.0%	-13.5	0.5520	
	2035	620,291	9,293,543	1498.3%	986,066	8,768,910	889.3%	-14.5	0.5282	
	2036	510,450	8,366,271	1639.0%	811,454	7,893,983	972.8%	-15.5	0.5055	
	2037	417,258	7,482,256	1793.2%	663,308	7,059,873	1064.3%	-16.5	0.4837	
	2038	338,725	6,627,556	1956.6%	538,465	6,253,422	1161.3%	-17.5	0.4629	
	2039	273,061	5,822,702	2132.4%	434,080	5,494,003	1265.7%	-18.5	0.4429	
	2040	218,553	5,072,059	2320.7%	347,430	4,785,735	1377.5%	-19.5	0.4239	
	2041	173,674	4,395,807	2531.1%	276,087	4,147,658	1502.3%	-20.5	0.4056	
	2042	137,004	3,788,855	2765.5%	217,793	3,574,969	1641.5%	-21.5	0.3882	
	2043	107,271	3,231,641	3012.6%	170,527	3,049,210	1788.1%	-22.5	0.3714	
	2044	83,375	2,731,953	3276.7%	132,539	2,577,730	1944.9%	-23.5	0.3554	
	2045	64,343	2,287,839	3555.7%	102,285	2,158,687	2110.5%	-24.5	0.3401	
	2046	49,316	1,904,151	3861.1%	78,397	1,796,659	2291.8%	-25.5	0.3255	
	2047	37,534	1,573,418	4192.0%	59,666	1,484,596	2488.2%	-26.5	0.3115	
	2048	28,368	1,284,038	4526.3%	45,096	1,211,552	2686.6%	-27.5	0.2981	
	2049	21,300	1,038,901	4877.4%	33,861	980,254	2894.9%	-28.5	0.2852	
	2050	15,893	836,874	5265.8%	25,264	789,632	3125.5%	-29.5	0.2729	
	2051	11,780	674,492	5725.6%	18,727	636,416	3398.4%	-30.5	0.2612	
	2052	8,676	541,460	6240.5%	13,793	510,894	3704.0%	-31.5	0.2499	
	2053	6,353	432,339	6805.4%	10,099	407,933	4039.3%	-32.5	0.2392	
	2054	4,626	345,687	7473.4%	7,353	326,173	4435.8%	-33.5	0.2289	
	2055	3,347	275,207	8221.4%	5,321	259,671	4879.8%	-34.5	0.2190	
	2056	2,407	218,282	9068.9%	3,826	205,959	5382.8%	-35.5	0.2096	
	2057	1,720	172,053	10004.2%	2,734	162,340	5937.9%	-36.5	0.2006	
	2058	1,221	131,894	10799.4%	1,941	124,449	6409.9%	-37.5	0.1919	
	2059	863	100,947	11702.3%	1,371	95,248	6945.9%	-38.5	0.1837	
	2060	604	77,725	12875.6%	960	73,337	7642.3%	-39.5	0.1758	
	Past	216,817,780	224,097,410	103.4%	216,817,780	224,097,410	103.4%			
	Future	39,011,989	281,974,895	722.8%	55,504,621	267,824,763	482.5%			
	Lifetime	255,829,770	506,072,305	197.8%	272,322,401	491,922,172	180.6%			
	Interest	Factor								
		Past w/ int	409,627,215	318,043,200	77.6%	409,627,215	318,043,200	77.6%		
		Future w/ int	30,903,091	193,397,260	625.8%	42,934,946	184,168,868	428.9%		
		Lifetime w/ int	440,530,307	511,440,460	116.1%	452,562,161	502,212,069	111.0%		

* Proposed rate increase: 3 Phases of 20.0% each; projection includes 3% shock lapse rate, 11% benefit reduction, and 2% of adverse selection.

John Alden Life Insurance Company
Pennsylvania Experience Projection
Policy Form: J-5762-P
Attachment G1

Calendar Year		Before Proposed Rate Increase			With Proposed Rate Increase*			at: 4.70%	
		Earned Premium	Incurred Claims	Loss Ratio	Earned Premium	Incurred Claims	Loss Ratio	Year End 2020	Factor 1.0470
Historical Experience	1992	0	0	0.0%	0	0	0.0%	28.5	3.7024
	1993	4,505	0	0.0%	4,505	0	0.0%	27.5	3.5362
	1994	17,333	0	0.0%	17,333	0	0.0%	26.5	3.3774
	1995	61,041	202,693	332.1%	61,041	202,693	332.1%	25.5	3.2258
	1996	135,071	72,907	54.0%	135,071	72,907	54.0%	24.5	3.0810
	1997	131,687	190,115	144.4%	131,687	190,115	144.4%	23.5	2.9427
	1998	117,205	0	0.0%	117,205	0	0.0%	22.5	2.8106
	1999	101,799	0	0.0%	101,799	0	0.0%	21.5	2.6844
	2000	92,752	584	0.6%	92,752	584	0.6%	20.5	2.5639
	2001	89,284	0	0.0%	89,284	0	0.0%	19.5	2.4488
	2002	83,322	0	0.0%	83,322	0	0.0%	18.5	2.3389
	2003	82,013	3,063	3.7%	82,013	3,063	3.7%	17.5	2.2339
	2004	76,468	60,303	78.9%	76,468	60,303	78.9%	16.5	2.1336
	2005	76,429	0	0.0%	76,429	0	0.0%	15.5	2.0379
	2006	78,218	207,078	264.7%	78,218	207,078	264.7%	14.5	1.9464
	2007	66,048	1,693	2.6%	66,048	1,693	2.6%	13.5	1.8590
	2008	60,806	0	0.0%	60,806	0	0.0%	12.5	1.7756
	2009	69,700	201,454	289.0%	69,700	201,454	289.0%	11.5	1.6958
	2010	65,924	4,375	6.6%	65,924	4,375	6.6%	10.5	1.6197
	2011	58,459	0	0.0%	58,459	0	0.0%	9.5	1.5470
Projected Future Experience	2012	67,073	129,084	192.5%	67,073	129,084	192.5%	8.5	1.4776
	2013	57,328	0	0.0%	57,328	0	0.0%	7.5	1.4112
	2014	57,973	16,275	28.1%	57,973	16,275	28.1%	6.5	1.3479
	2015	53,117	23,504	44.2%	53,117	23,504	44.2%	5.5	1.2874
	2016	48,940	1,288	2.6%	48,940	1,288	2.6%	4.5	1.2296
	2017	53,788	184,498	343.0%	53,788	184,498	343.0%	3.5	1.1744
	2018	53,170	13,766	25.9%	53,170	13,766	25.9%	2.5	1.1217
	2019	46,906	0	0.0%	46,906	0	0.0%	1.5	1.0713
	2020	41,129	713,212	1734.1%	41,129	713,212	1734.1%	0.5	1.0232
	2021	33,934	128,869	379.8%	33,934	128,869	379.8%	-0.5	0.9773
	2022	28,288	122,370	432.6%	32,075	118,853	370.6%	-1.5	0.9334
	2023	23,564	116,780	495.6%	31,601	111,659	353.3%	-2.5	0.8915
	2024	19,586	109,122	557.1%	31,136	102,962	330.7%	-3.5	0.8515
	2025	16,233	98,872	609.1%	25,806	93,290	361.5%	-4.5	0.8133
	2026	13,428	90,683	675.3%	21,346	85,564	400.8%	-5.5	0.7768
	2027	11,078	82,280	742.8%	17,610	77,635	440.9%	-6.5	0.7419
	2028	9,127	75,178	823.7%	14,509	70,934	488.9%	-7.5	0.7086
	2029	7,491	69,277	924.8%	11,909	65,367	548.9%	-8.5	0.6768
	2030	6,124	63,442	1035.9%	9,735	59,860	614.9%	-9.5	0.6464
	2031	4,987	56,992	1142.8%	7,928	53,775	678.3%	-10.5	0.6174
2032	4,045	50,648	1252.1%	6,430	47,789	743.2%	-11.5	0.5897	
2033	3,262	45,510	1395.3%	5,185	42,941	828.2%	-12.5	0.5632	
2034	2,611	40,325	1544.3%	4,151	38,049	916.6%	-13.5	0.5379	
2035	2,076	35,153	1693.5%	3,300	33,169	1005.2%	-14.5	0.5138	
2036	1,637	30,350	1854.3%	2,602	28,637	1100.6%	-15.5	0.4907	
2037	1,277	25,250	1977.1%	2,030	23,825	1173.5%	-16.5	0.4687	
2038	987	20,765	2103.1%	1,570	19,593	1248.3%	-17.5	0.4476	
2039	754	17,138	2273.2%	1,198	16,171	1349.2%	-18.5	0.4275	
2040	568	14,009	2465.1%	903	13,219	1463.1%	-19.5	0.4084	
2041	422	11,404	2700.8%	671	10,760	1603.1%	-20.5	0.3900	
2042	309	9,149	2963.5%	491	8,633	1759.0%	-21.5	0.3725	
2043	222	7,188	3236.1%	353	6,783	1920.8%	-22.5	0.3558	
2044	157	5,475	3485.9%	250	5,166	2069.0%	-23.5	0.3398	
2045	109	4,050	3707.0%	174	3,821	2200.3%	-24.5	0.3246	
2046	75	2,942	3940.5%	119	2,776	2338.9%	-25.5	0.3100	
2047	50	2,095	4199.0%	79	1,977	2492.3%	-26.5	0.2961	
2048	33	1,468	4476.8%	52	1,385	2657.2%	-27.5	0.2828	
2049	21	1,005	4771.0%	33	948	2831.8%	-28.5	0.2701	
2050	13	674	5096.7%	21	636	3025.1%	-29.5	0.2580	
2051	8	441	5450.3%	13	416	3235.0%	-30.5	0.2464	
2052	5	281	5842.1%	8	265	3467.6%	-31.5	0.2353	
2053	3	172	6354.3%	4	162	3771.6%	-32.5	0.2248	
2054	2	101	6630.5%	2	96	3935.5%	-33.5	0.2147	
2055	1	59	7034.2%	1	56	4175.1%	-34.5	0.2050	
2056	0	33	7382.5%	1	31	4381.8%	-35.5	0.1958	
2057	0	17	9643.8%	0	16	5724.0%	-36.5	0.1870	
2058	0	8	9767.3%	0	8	5797.3%	-37.5	0.1786	
2059	0	2	113018.9%	0	2	67081.9%	-38.5	0.1706	
2060	0	0	0.0%	0	0	0.0%	-39.5	0.1630	
Past Future Lifetime	Past	1,947,491	2,025,893	104.0%	1,947,491	2,025,893	104.0%		
	Future	192,487	1,339,579	695.9%	267,230	1,276,095	477.5%		
	Lifetime	2,139,978	3,365,472	157.3%	2,214,721	3,301,988	149.1%		
Interest Factor	Past w/ int	4,131,452	3,536,261	85.6%	4,131,452	3,536,261	85.6%		
	Future w/ int	157,280	986,005	626.9%	213,210	941,930	441.8%		
	Lifetime w/ int	4,288,732	4,522,266	105.4%	4,344,662	4,478,191	103.1%		

* Proposed rate increase: 3 Phases of 20.0% each; projection includes 3% shock lapse rate, 11% benefit reduction, and 2% of adverse selection.

John Alden Life Insurance Company
Pennsylvania Experience Projection
Policy Form: J-5875-P
Attachment G2

Calendar Year		Before Proposed Rate Increase			With Proposed Rate Increase*			at:	4.50%
		Earned Premium	Incurred Claims	Loss Ratio	Earned Premium	Incurred Claims	Loss Ratio	Year End 2020	Factor 1.0450
Historical Experience	1992	0	0	0.0%	0	0	0.0%	28.5	3.5060
	1993	0	0	0.0%	0	0	0.0%	27.5	3.3550
	1994	0	0	0.0%	0	0	0.0%	26.5	3.2106
	1995	0	0	0.0%	0	0	0.0%	25.5	3.0723
	1996	29,481	0	0.0%	29,481	0	0.0%	24.5	2.9400
	1997	349,354	0	0.0%	349,354	0	0.0%	23.5	2.8134
	1998	424,107	26,968	6.4%	424,107	26,968	6.4%	22.5	2.6923
	1999	480,392	0	0.0%	480,392	0	0.0%	21.5	2.5763
	2000	512,887	0	0.0%	512,887	0	0.0%	20.5	2.4654
	2001	487,285	17,600	3.6%	487,285	17,600	3.6%	19.5	2.3592
	2002	452,856	130,495	28.8%	452,856	130,495	28.8%	18.5	2.2576
	2003	437,252	0	0.0%	437,252	0	0.0%	17.5	2.1604
	2004	428,672	81,250	19.0%	428,672	81,250	19.0%	16.5	2.0674
	2005	432,568	73,827	17.1%	432,568	73,827	17.1%	15.5	1.9783
	2006	407,200	423,862	104.1%	407,200	423,862	104.1%	14.5	1.8932
	2007	388,741	128,427	33.0%	388,741	128,427	33.0%	13.5	1.8116
	2008	365,315	872,979	239.0%	365,315	872,979	239.0%	12.5	1.7336
	2009	381,931	37,680	9.9%	381,931	37,680	9.9%	11.5	1.6590
	2010	327,226	374,118	114.3%	327,226	374,118	114.3%	10.5	1.5875
	2011	311,184	976,199	313.7%	311,184	976,199	313.7%	9.5	1.5192
	2012	326,122	1,342	0.4%	326,122	1,342	0.4%	8.5	1.4537
	2013	334,079	277,957	83.2%	334,079	277,957	83.2%	7.5	1.3911
2014	316,356	154,962	49.0%	316,356	154,962	49.0%	6.5	1.3312	
2015	306,222	59,306	19.4%	306,222	59,306	19.4%	5.5	1.2739	
2016	296,750	1,386,800	467.3%	296,750	1,386,800	467.3%	4.5	1.2191	
2017	299,240	352,063	117.7%	299,240	352,063	117.7%	3.5	1.1666	
2018	318,365	101,674	31.9%	318,365	101,674	31.9%	2.5	1.1163	
2019	306,780	545,232	177.7%	306,780	545,232	177.7%	1.5	1.0683	
2020	274,382	1,142,187	416.3%	274,382	1,142,187	416.3%	0.5	1.0223	
Projected Future Experience	2021	260,290	677,940	260.5%	260,290	677,940	260.5%	-0.5	0.9782
	2022	227,531	672,960	295.8%	257,988	653,620	253.4%	-1.5	0.9361
	2023	198,764	662,676	333.4%	266,552	633,615	237.7%	-2.5	0.8958
	2024	173,509	646,519	372.6%	275,824	610,022	221.2%	-3.5	0.8572
	2025	151,309	629,239	415.9%	240,532	593,718	246.8%	-4.5	0.8203
	2026	131,693	609,093	462.5%	209,350	574,709	274.5%	-5.5	0.7850
	2027	114,350	582,641	509.5%	181,781	549,750	302.4%	-6.5	0.7512
	2028	98,982	559,156	564.9%	157,351	527,591	335.3%	-7.5	0.7188
	2029	85,306	532,730	624.5%	135,610	502,657	370.7%	-8.5	0.6879
	2030	73,177	498,331	681.0%	116,328	470,200	404.2%	-9.5	0.6583
	2031	62,502	463,706	741.9%	99,359	437,529	440.4%	-10.5	0.6299
	2032	53,116	429,336	808.3%	84,437	405,099	479.8%	-11.5	0.6028
	2033	44,893	398,149	886.9%	71,365	375,673	526.4%	-12.5	0.5768
	2034	37,708	369,205	979.1%	59,943	348,362	581.2%	-13.5	0.5520
	2035	31,486	338,369	1074.6%	50,054	319,267	637.9%	-14.5	0.5282
	2036	26,136	310,636	1188.5%	41,548	293,100	705.5%	-15.5	0.5055
	2037	21,547	286,224	1328.4%	34,253	270,067	788.4%	-16.5	0.4837
	2038	17,634	261,511	1483.0%	28,032	246,748	880.2%	-17.5	0.4629
	2039	14,331	235,318	1642.0%	22,782	222,034	974.6%	-18.5	0.4429
	2040	11,566	211,605	1829.5%	18,387	199,659	1085.9%	-19.5	0.4239
	2041	9,259	190,159	2053.8%	14,719	179,424	1219.0%	-20.5	0.4056
	2042	7,349	164,650	2240.3%	11,683	155,355	1329.7%	-21.5	0.3882
	2043	5,788	138,204	2387.7%	9,201	130,403	1417.2%	-22.5	0.3714
	2044	4,519	116,628	2580.9%	7,184	110,045	1531.9%	-23.5	0.3554
	2045	3,494	95,605	2736.4%	5,554	90,208	1624.2%	-24.5	0.3401
	2046	2,673	78,146	2923.2%	4,250	73,735	1735.1%	-25.5	0.3255
	2047	2,021	63,695	3151.1%	3,213	60,100	1870.3%	-26.5	0.3115
	2048	1,510	51,314	3399.3%	2,400	48,418	2017.7%	-27.5	0.2981
	2049	1,112	40,760	3665.5%	1,768	38,459	2175.6%	-28.5	0.2852
	2050	809	31,411	3882.3%	1,286	29,638	2304.3%	-29.5	0.2729
	2051	580	23,774	4095.6%	923	22,432	2430.9%	-30.5	0.2612
	2052	410	17,516	4270.0%	652	16,527	2534.4%	-31.5	0.2499
	2053	286	12,642	4425.4%	454	11,928	2626.7%	-32.5	0.2392
	2054	196	8,973	4586.5%	311	8,466	2722.3%	-33.5	0.2289
	2055	131	6,254	4756.9%	209	5,901	2823.5%	-34.5	0.2190
	2056	87	4,269	4921.7%	138	4,028	2921.2%	-35.5	0.2096
	2057	56	2,841	5101.4%	89	2,681	3027.9%	-36.5	0.2006
	2058	35	1,845	5251.0%	56	1,741	3116.7%	-37.5	0.1919
	2059	22	1,171	5415.8%	34	1,105	3214.5%	-38.5	0.1837
2060	13	720	5608.9%	20	679	3329.1%	-39.5	0.1758	
Past Future Lifetime	Past	8,994,747	7,164,928	79.7%	8,994,747	7,164,928	79.7%		
	Future	1,876,180	10,425,921	555.7%	2,675,910	9,902,631	370.1%		
	Lifetime	10,870,927	17,590,849	161.8%	11,670,657	17,067,559	146.2%		
Interest Factor									
	Past w/ int	16,730,919	10,046,027	60.0%	16,730,919	10,046,027	60.0%		
	Future w/ int	1,478,055	7,109,200	481.0%	2,058,134	6,770,249	329.0%		
	Lifetime w/ int	18,208,973	17,155,227	94.2%	18,789,053	16,816,276	89.5%		

* Proposed rate increase: 3 Phases of 20.0% each; projection includes 3% shock lapse rate, 11% benefit reduction, and 2% of adverse selection.

John Alden Life Insurance Company
Policy Form: J-5762-P
Exhibit H1
Nationwide Policy and Premium Distribution

	Policies	Premium	% of Policies	% of Premium
Base				
Comprehensive 100% HHC	120	305,204	10%	14%
Comprehensive 50% HHC	429	910,052	36%	42%
Facility Only	649	939,598	54%	44%
Total	1,198	2,154,855	100%	100%
COLA Options				
No COLA	494	729,341	41%	34%
Compound COLA 5%	684	1,398,200	57%	65%
Simple COLA 5%	20	27,314	2%	1%
Total	1,198	2,154,855	100%	100%
Nonforfeiture Options				
None	809	1,289,108	68%	60%
Full ROP	323	722,356	27%	34%
Limited ROP	66	143,391	6%	7%
Total	1,198	2,154,855	100%	100%
Joint/Single Life				
Joint	327	724,295	27%	34%
Single	871	1,430,560	73%	66%
Total	1,198	2,154,855	100%	100%
Billing Mode				
Annual	682	1,241,486	57%	58%
Semi-Annual	61	113,507	5%	5%
Quarterly	126	234,099	11%	11%
Monthly	329	565,762	27%	26%
Total	1,198	2,154,855	100%	100%
Elimination Period				
0 Day	277	524,302	23%	24%
30 Days	9	18,859	1%	1%
90 Days	798	1,405,319	67%	65%
180 Days	114	206,375	10%	10%
Total	1,198	2,154,855	100%	100%
Benefit Period (NH/HH)				
3 Year / 3 Year	198	289,689	17%	13%
Lifetime / Lifetime	1,000	1,865,166	83%	87%
Total	1,198	2,154,855	100%	100%
Issue Age Cohort				
20-29	1	928	0%	0%
30-39	2	1,081	0%	0%
40-49	73	82,340	6%	4%
50-59	371	533,262	31%	25%
60-69	689	1,367,949	58%	63%
70-79	62	169,294	5%	8%
Total	1,198	2,154,855	100%	100%

John Alden Life Insurance Company
Policy Form: J-5875-P
Exhibit H2
Nationwide Policy and Premium Distribution

	Policies	Premium	% of Policies	% of Premium
Base				
Comprehensive w/ Reimbursement HHC	1,002	2,205,768	32%	34%
Comprehensive w/ Indemnity HHC	1,097	2,536,171	35%	40%
Facility Only with ALF	360	658,856	12%	10%
Facility Only	642	994,194	21%	16%
Total	3,101	6,394,988	100%	100%
COLA Options				
No COLA	781	1,230,728	25%	19%
Compound COLA 5%	1,199	2,681,621	39%	42%
Simple COLA 5%	1,121	2,482,639	36%	39%
Total	3,101	6,394,988	100%	100%
Nonforfeiture Options				
None	2,728	5,398,597	88%	84%
Full ROP	257	697,036	8%	11%
SBP NFO	3	11,847	0%	0%
Limited ROP	113	287,509	4%	4%
Total	3,101	6,394,988	100%	100%
Joint/Single Life				
Joint	1,209	2,973,267	39%	46%
Single	1,892	3,421,721	61%	54%
Total	3,101	6,394,988	100%	100%
Billing Mode				
Annual	1,598	3,247,843	52%	51%
Semi-Annual	165	344,415	5%	5%
Quarterly	321	675,628	10%	11%
Monthly	1,017	2,127,102	33%	33%
Total	3,101	6,394,988	100%	100%
Elimination Period				
0 Day	162	345,138	5%	5%
30 Days	485	1,053,912	16%	16%
90 Days	2,303	4,690,425	74%	73%
180 Days	151	305,513	5%	5%
Total	3,101	6,394,988	100%	100%
Benefit Period (NH/HH)				
2 Year / 2 Year	53	75,101	2%	1%
3 Year / 2 Year	23	38,427	1%	1%
3 Year / 3 Year	251	460,279	8%	7%
4 Year / 2 Year	58	119,064	2%	2%
4 Year / 3 Year	28	56,684	1%	1%
4 Year / 4 Year	281	531,133	9%	8%
Lifetime / 2 Year	144	334,608	5%	5%
Lifetime / 3 Year	253	565,919	8%	9%
Lifetime / 4 Year	152	338,023	5%	5%
Lifetime / Lifetime	1,858	3,875,751	60%	61%
Total	3,101	6,394,988	100%	100%
Issue Age Cohort				
20-29	1	609	0%	0%
30-39	10	7,364	0%	0%
40-49	185	248,549	6%	4%
50-59	1,158	2,067,769	37%	32%
60-69	1,591	3,578,544	51%	56%
70-79	156	492,154	5%	8%
Total	3,101	6,394,988	100%	100%

John Alden Life Insurance Company
Policy Form: J-5762-P
Exhibit H3
Pennsylvania Policy and Premium Distribution

	Policies	Premium	% of Policies	% of Premium
Base				
Comprehensive 100% HHC	1	1,550	4%	3%
Comprehensive 50% HHC	9	19,388	36%	41%
Facility Only	15	26,386	60%	56%
Total	25	47,323	100%	100%
COLA Options				
No COLA	15	24,499	60%	52%
Compound COLA 5%	10	22,825	40%	48%
Simple COLA 5%	0	0	0%	0%
Total	25	47,323	100%	100%
Nonforfeiture Options				
None	25	47,323	100%	100%
Full ROP	0	0	0%	0%
Limited ROP	0	0	0%	0%
Total	25	47,323	100%	100%
Joint/Single Life				
Joint	9	21,207	36%	45%
Single	16	26,117	64%	55%
Total	25	47,323	100%	100%
Billing Mode				
Annual	12	19,413	48%	41%
Semi-Annual	2	5,308	8%	11%
Quarterly	5	10,845	20%	23%
Monthly	6	11,758	24%	25%
Total	25	47,323	100%	100%
Elimination Period				
0 Day	8	15,416	32%	33%
30 Days	1	1,088	4%	2%
90 Days	13	23,552	52%	50%
180 Days	3	7,268	12%	15%
Total	25	47,323	100%	100%
Benefit Period (NH/HH)				
3 Year / 3 Year	2	4,853	8%	10%
Lifetime / Lifetime	23	42,470	92%	90%
Total	25	47,323	100%	100%
Issue Age Cohort				
20-29	0	0	0%	0%
30-39	0	0	0%	0%
40-49	0	0	0%	0%
50-59	8	11,791	32%	25%
60-69	15	30,680	60%	65%
70-79	2	4,852	8%	10%
Total	25	47,323	100%	100%

John Alden Life Insurance Company
Policy Form: J-5875-P
Exhibit H4
Pennsylvania Policy and Premium Distribution

	Policies	Premium	% of Policies	% of Premium
Base				
Comprehensive w/ Reimbursement HHC	78	198,200	66%	67%
Comprehensive w/ Indemnity HHC	21	53,805	18%	18%
Facility Only with ALF	2	9,488	2%	3%
Facility Only	18	35,968	15%	12%
Total	119	297,462	100%	100%
COLA Options				
No COLA	26	53,458	22%	18%
Compound COLA 5%	35	95,640	29%	32%
Simple COLA 5%	58	148,364	49%	50%
Total	119	297,462	100%	100%
Nonforfeiture Options				
None	100	236,128	84%	79%
Full ROP	12	39,859	10%	13%
SBP NFO	0	0	0%	0%
Limited ROP	7	21,475	6%	7%
Total	119	297,462	100%	100%
Joint/Single Life				
Joint	49	129,428	41%	44%
Single	70	168,034	59%	56%
Total	119	297,462	100%	100%
Billing Mode				
Annual	64	154,371	54%	52%
Semi-Annual	6	15,376	5%	5%
Quarterly	12	36,572	10%	12%
Monthly	37	91,143	31%	31%
Total	119	297,462	100%	100%
Elimination Period				
0 Day	9	25,013	8%	8%
30 Days	16	43,359	13%	15%
90 Days	88	215,199	74%	72%
180 Days	6	13,890	5%	5%
Total	119	297,462	100%	100%
Benefit Period (NH/HH)				
2 Year / 2 Year	4	5,338	3%	2%
3 Year / 2 Year	0	0	0%	0%
3 Year / 3 Year	11	19,105	9%	6%
4 Year / 2 Year	1	1,169	1%	0%
4 Year / 3 Year	1	3,938	1%	1%
4 Year / 4 Year	10	20,142	8%	7%
Lifetime / 2 Year	3	7,259	3%	2%
Lifetime / 3 Year	8	18,658	7%	6%
Lifetime / 4 Year	0	0	0%	0%
Lifetime / Lifetime	81	221,854	68%	75%
Total	119	297,462	100%	100%
Issue Age Cohort				
20-29	0	0	0%	0%
30-39	0	0	0%	0%
40-49	8	15,650	7%	5%
50-59	46	98,266	39%	33%
60-69	57	157,487	48%	53%
70-79	8	26,058	7%	9%
Total	119	297,462	100%	100%



ASSURANT

John Alden Life Insurance Company
Administrative Office
11222 Quail Roost Drive
Miami, FL 33157

February 23 2021

LifeCare Assurance Company
21600 Oxnard Street, Suite 1500
Woodland Hills, CA 91367

RE: John Alden Life Insurance Company (NAIC 65080)

Dear LifeCare Assurance Company:

This letter gives LifeCare Assurance Company the authorization to submit for review and approval long term care products and associated forms and materials for and in the name of John Alden Life Insurance Company.

Sincerely,

Paula SeGuin

President

Paula.seguin@assurant.com

(315)637- 4232 Ext. 2832910

John Alden Life Insurance Company
Nationwide Experience Projection
Policy Forms: J-5762-P and J-5875-P Combined

Attachment Q2
Nationwide Experience Projection With Restated Earned Premiums at the Current Pennsylvania Rate Level from Inception

Calendar Year		Earned Premium	Incurred Claims	Loss Ratio
Historical Experience	1992	25,360	0	0.0%
	1993	746,128	136,808	18.3%
	1994	2,295,491	8,756	0.4%
	1995	6,029,427	533,026	8.8%
	1996	9,649,677	754,308	7.8%
	1997	17,125,508	885,971	5.2%
	1998	16,734,963	2,005,950	12.0%
	1999	16,179,464	3,176,941	19.6%
	2000	17,308,264	3,153,971	18.2%
	2001	16,391,917	6,167,067	37.6%
	2002	15,107,651	6,089,682	40.3%
	2003	14,691,168	8,303,099	56.5%
	2004	14,005,972	9,891,733	70.6%
	2005	14,109,360	8,430,323	59.7%
	2006	13,186,553	10,245,618	77.7%
	2007	12,332,679	13,115,913	106.4%
	2008	11,823,815	14,918,705	126.2%
	2009	13,051,973	19,953,802	152.9%
	2010	12,706,923	17,518,262	137.9%
	2011	12,096,376	19,970,616	165.1%
	2012	12,382,669	20,090,702	162.2%
	2013	12,043,300	18,053,996	149.9%
	2014	11,321,951	26,792,968	236.6%
Projected Future Experience	2015	10,750,025	27,546,959	256.3%
	2016	10,014,758	35,666,988	356.1%
	2017	10,153,894	27,034,156	266.2%
	2018	9,976,877	27,312,814	273.8%
	2019	9,129,409	26,005,569	284.9%
	2020	8,503,554	27,582,187	324.4%
	2021	7,757,625	26,485,335	341.4%
	2022	6,688,725	25,916,932	387.5%
	2023	5,763,743	25,165,084	436.6%
	2024	4,961,948	24,265,092	489.0%
	2025	4,265,311	23,265,311	545.5%
	2026	3,659,333	22,170,206	605.9%
	2027	3,131,641	21,004,162	670.7%
	2028	2,671,959	19,814,229	741.6%
	2029	2,271,611	18,594,530	818.6%
	2030	1,923,484	17,340,353	901.5%
	2031	1,621,545	16,119,198	994.1%
	2032	1,360,372	14,898,812	1095.2%
	2033	1,135,274	13,680,782	1205.1%
	2034	942,207	12,477,962	1324.3%
	2035	777,482	11,274,050	1450.1%
	2036	637,760	10,119,390	1586.7%
	2037	519,890	9,022,614	1735.5%
	2038	421,054	7,974,489	1893.9%
	2039	338,744	6,999,488	2066.3%
	2040	270,647	6,085,946	2248.7%
	2041	214,744	5,260,824	2449.8%
	2042	169,178	4,518,217	2670.7%
	2043	132,322	3,841,533	2903.2%
	2044	102,754	3,240,359	3153.5%
	2045	79,245	2,708,827	3418.3%
	2046	60,708	2,251,563	3708.8%
	2047	46,194	1,858,642	4023.6%
	2048	34,922	1,514,440	4336.6%
	2049	26,244	1,224,631	4666.4%
	2050	19,612	987,144	5033.3%
	2051	14,577	796,199	5462.1%
	2052	10,780	639,962	5936.4%
	2053	7,939	513,483	6467.9%
	2054	5,826	413,636	7100.1%
	2055	4,260	332,876	7814.5%
	2056	3,102	267,749	8632.0%
	2057	2,250	214,254	9520.7%
	2058	1,627	166,307	10218.9%
	2059	1,175	127,944	10892.5%
	2060	843	99,750	11826.1%
Past Future Lifetime		329,875,107 52,058,658 381,933,765	381,346,890 363,652,304 744,999,194	115.6% 698.5% 195.1%
Interest	Factor			
	Past w/ int	648,780,328	563,265,571	86.8%
	Future w/ int	41,467,852	252,842,008	609.7%
	Lifetime w/ int	690,248,180	816,107,579	118.2%

John Alden Life Insurance Company
Nationwide Experience Projection
Policy Forms: J-5762-P and J-5875-P Combined

Attachment Q3
Nationwide Experience Projection With Restated Earned Premiums at the Original Rate Level from Inception

		Earned Premium	Incurred Claims	Loss Ratio
Calendar Year				
Historical Experience	1992	25,360	0	0.0%
	1993	746,128	136,808	18.3%
	1994	2,295,491	8,756	0.4%
	1995	6,029,427	533,026	8.8%
	1996	9,649,677	754,308	7.8%
	1997	17,125,508	885,971	5.2%
	1998	16,734,963	2,005,950	12.0%
	1999	16,179,464	3,176,941	19.6%
	2000	17,308,264	3,153,971	18.2%
	2001	16,391,917	6,167,067	37.6%
	2002	15,107,651	6,089,682	40.3%
	2003	14,691,168	8,303,099	56.5%
	2004	14,005,972	9,891,733	70.6%
	2005	14,109,360	8,430,323	59.7%
	2006	13,186,553	10,245,618	77.7%
	2007	12,332,679	13,115,913	106.4%
	2008	11,823,815	14,918,705	126.2%
	2009	10,577,813	19,953,802	188.6%
	2010	10,165,538	17,518,262	172.3%
	2011	9,677,101	19,970,616	206.4%
	2012	8,948,306	20,090,702	224.5%
	2013	8,377,948	18,053,996	215.5%
	2014	7,876,140	26,792,968	340.2%
	2015	7,478,278	27,546,959	368.4%
	2016	6,966,788	35,666,988	512.0%
	2017	6,159,142	27,034,156	438.9%
	2018	5,783,697	27,312,814	472.2%
	2019	5,292,411	26,005,569	491.4%
	2020	4,929,596	27,582,187	559.5%
Projected Future Experience	2021	4,497,174	26,485,335	588.9%
	2022	3,877,522	25,916,932	668.4%
	2023	3,341,300	25,165,084	753.2%
	2024	2,876,492	24,265,092	843.6%
	2025	2,472,644	23,265,311	940.9%
	2026	2,121,352	22,170,206	1045.1%
	2027	1,815,444	21,004,162	1157.0%
	2028	1,548,962	19,814,229	1279.2%
	2029	1,316,876	18,594,530	1412.0%
	2030	1,115,063	17,340,353	1555.1%
	2031	940,026	16,119,198	1714.8%
	2032	788,622	14,898,812	1889.2%
	2033	658,130	13,680,782	2078.7%
	2034	546,207	12,477,962	2284.5%
	2035	450,714	11,274,050	2501.4%
	2036	369,716	10,119,390	2737.1%
	2037	301,386	9,022,614	2993.7%
	2038	244,089	7,974,489	3267.0%
	2039	196,373	6,999,488	3564.4%
	2040	156,897	6,085,946	3879.0%
	2041	124,489	5,260,824	4225.9%
	2042	98,074	4,518,217	4606.9%
	2043	76,708	3,841,533	5008.0%
	2044	59,568	3,240,359	5439.8%
	2045	45,939	2,708,827	5896.6%
	2046	35,193	2,251,563	6397.7%
	2047	26,779	1,858,642	6940.6%
	2048	20,245	1,514,440	7480.7%
	2049	15,214	1,224,631	8049.5%
	2050	11,369	987,144	8682.4%
	2051	8,450	796,199	9422.2%
	2052	6,249	639,962	10240.4%
	2053	4,602	513,483	11157.1%
	2054	3,377	413,636	12247.6%
	2055	2,469	332,876	13480.0%
	2056	1,798	267,749	14890.1%
	2057	1,305	214,254	16423.3%
	2058	943	166,307	17627.6%
	2059	681	127,944	18789.6%
	2060	489	99,750	20400.1%
Past Future Lifetime		289,976,156 30,178,932 320,155,089	381,346,890 363,652,304 744,999,194	131.5% 1205.0% 232.7%
Interest	Factor			
	Past w/ int	597,138,874	563,265,571	94.3%
	Future w/ int	24,039,335	252,842,008	1051.8%
	Lifetime w/ int	621,178,209	816,107,579	131.4%

John Alden Life Insurance Company
Rate Increase Filing Information
Policy Form: J-5762-P
Attachment Q6.1

	State	2008	2011	2016	Current Rate Increase						Cumulative Rate Increase	YE2020 Policyholder Count	YE2020 Annual Premium
		Average Approved	Average Approved	Average Approved	Filing Status	Proposed Increase	Submission Date	Approved Increase	Approval Date	Notes			
AL	Alabama	29.0%	20.0%	20.0%	Filed	72.8%	8/10/2021				85.76%	10	8,661
AR	Arkansas	20.0%	0.0%	20.0%	Not Filed						44.00%	3	2,347
AZ	Arizona	0.0%	20.0%	20.0%	Filed	72.8%	7/16/2021				44.00%	6	9,614
CA	California	34.0%	20.0%	20.0%	Not Filed						92.96%	143	226,947
CO	Colorado	35.0%	20.0%	0.0%	Not Filed						62.00%	32	45,010
CT	Connecticut	0.0%	0.0%	20.0%	Not Filed						19.98%	8	8,108
DC	District of Columbia	0.0%	10.0%	21.0%	Not Filed						33.10%	1	546
DE	Delaware	0.0%	15.0%	20.0%	Not Filed						38.00%	4	6,966
FL	Florida	0.0%	0.0%	79.4%	Not Filed						79.44%	71	123,430
GA	Georgia	15.0%	15.0%	15.0%	Filed	72.8%	9/14/2021				52.09%	50	54,541
HI	Hawaii	39.0%	20.0%	20.2%	Not Filed						100.45%	10	22,375
IA	Iowa	10.0%	10.0%	20.0%	Approved	72.8%	6/17/2021	39%	9/17/2021	2-year phase-in increase of 17.9% each year	101.83%	125	150,376
ID	Idaho	25.0%	15.0%	0.0%	Not Filed						43.75%	4	6,757
IL	Illinois	31.2%	20.0%	20.0%	Filed	72.8%	5/20/2021				88.93%	59	91,932
IN	Indiana	32.0%	9.0%	0.0%	Not Filed						43.88%	26	33,459
KS	Kansas	15.0%	10.0%	16.4%	Not Filed						47.25%	64	100,431
KY	Kentucky	30.0%	15.0%	20.0%	Not Filed						79.40%	10	21,549
LA	Louisiana	25.0%	0.0%	20.0%	Filed	72.8%	7/28/2021				50.00%	23	29,130
MA	Massachusetts	0.0%	0.0%	10.0%	Filed	72.8%	8/4/2021				10.00%	16	18,717
MD	Maryland	20.0%	15.0%	15.0%	Not Filed						58.70%	12	19,586
ME	Maine	35.0%	20.0%	19.9%	Not Filed						94.31%	4	2,941
MI	Michigan	34.0%	20.0%	20.0%	Approved	72.8%	8/9/2021	72.8%	8/30/2021	3-year phase-in increase of 20% each year	233.43%	32	63,524
MN	Minnesota	27.0%	0.0%	19.6%	Not Filed						51.89%	5	5,141
MO	Missouri	34.0%	20.0%	20.0%	Approved	72.8%	4/16/2021	72.8%	9/7/2021	3-year phase-in increase of 20% each year	233.43%	52	66,938
MS	Mississippi	25.0%	20.0%	20.0%	Not Filed						80.00%	7	7,385
MT	Montana	28.0%	20.0%	11.6%	Not Filed						71.42%	5	8,284
NC	North Carolina	33.0%	20.0%	20.0%	Filed	72.8%	4/15/2021				91.52%	82	131,515
ND	North Dakota	25.0%	15.0%	15.0%	Approved	72.8%	5/17/2021	44%	6/23/2021	2-year phase-in increase of 20% each year	138.05%	7	4,508
NE	Nebraska	31.0%	20.0%	20.0%	Filed	72.8%	7/13/2021				88.64%	102	129,436
NH	New Hampshire	34.0%	20.0%	10.0%	Not Filed						76.88%	30	60,941
NJ	New Jersey	10.0%	20.0%	10.3%	Filed	72.8%	9/14/2021				45.53%	2	6,429
NV	Nevada	31.0%	20.0%	20.0%	Not Filed						88.64%	11	19,411
OH	Ohio	10.0%	20.0%	15.0%	Filed	72.8%	4/20/2021				51.80%	150	166,400
OK	Oklahoma	15.0%	20.0%	10.0%	Not Filed						51.80%	4	2,492
PA	Pennsylvania	25.0%	15.0%	20.0%	Filed	72.8%	8/9/2021				72.50%	34	47,323
RI	Rhode Island	28.0%	0.0%	44.0%	Not Filed						84.32%	2	1,552
SC	South Carolina	20.0%	20.0%	20.0%	Approved	72.8%	5/26/2021	15%	7/13/2021		98.72%	45	64,522
SD	South Dakota	37.0%	20.0%	20.0%	Not Filed						97.28%	5	5,623
TN	Tennessee	30.0%	10.0%	20.0%	Filed	72.8%	6/10/2021				71.60%	8	13,862
TX	Texas	23.0%	15.0%	20.0%	Disapproved	72.8%	8/17/2021	0%	9/9/2021		69.74%	55	75,782
UT	Utah	35.0%	0.0%	20.0%	Not Filed						62.00%	5	5,239
VA	Virginia	25.0%	0.0%	20.0%	Not Filed						50.00%	22	27,661
WA	Washington	15.0%	20.0%	20.0%	Filed	72.8%	5/20/2021				65.60%	118	176,645
WI	Wisconsin	0.0%	20.0%	11.4%	Filed	72.8%	5/21/2021				33.68%	36	49,884
WV	West Virginia	29.0%	20.0%	20.0%	Not Filed						85.76%	24	29,121
WY	Wyoming	25.0%	20.0%	20.0%	Not Filed						80.00%	1	1,811

John Alden Life Insurance Company
Rate Increase Filing Information
Policy Form: J-5875-P
Attachment Q6.2

	State	2008	2011	2016	Current Rate Increase						Cumulative Rate Increase	YE2020 Policyholder Count	YE2020 Annual Premium
		Average Approved	Average Approved	Average Approved	Filing Status	Proposed Increase	Submission Date	Approved Increase	Approval Date	Notes			
AK	Alaska	29.0%	20.0%	20.0%	No Filing Required						85.76%	2	4,956
AL	Alabama	29.0%	20.0%	20.0%	Filed	72.8%	8/10/2021				85.76%	25	43,579
AR	Arkansas	20.0%	0.0%	20.0%	Not Filed						44.00%	25	33,933
AZ	Arizona	0.0%	20.0%	20.0%	Filed	72.8%	7/16/2021				44.00%	34	63,298
CA	California	34.0%	0.0%	20.0%	Not Filed						60.80%	58	63,052
CO	Colorado	35.0%	20.0%	20.8%	Not Filed						95.62%	117	191,353
CT	Connecticut	0.0%	0.0%	20.0%	Not Filed						19.98%	66	117,140
DC	District of Columbia	0.0%	10.0%	21.0%	Not Filed						33.10%	2	4,453
DE	Delaware	0.0%	15.0%	20.0%	Not Filed						38.00%	8	9,446
FL	Florida	0.0%	0.0%	77.7%	Not Filed						77.67%	218	313,286
GA	Georgia	15.0%	15.0%	15.0%	Filed	72.8%	9/14/2021				52.09%	89	133,507
HI	Hawaii	39.0%	20.0%	20.2%	Not Filed						100.45%	13	35,995
IA	Iowa	10.0%	20.0%	20.0%	Approved	72.8%	6/17/2021	39%	9/17/2021	2-year phase-in increase of 17.9% each year	120.18%	223	257,314
ID	Idaho	25.0%	15.0%	0.0%	Not Filed						43.75%	15	23,152
IL	Illinois	32.6%	20.0%	20.0%	Filed	72.8%	5/20/2021				90.94%	242	399,383
IN	Indiana	32.0%	9.0%	0.0%	Not Filed						43.88%	26	34,631
KS	Kansas	15.0%	10.0%	16.4%	Not Filed						47.25%	70	91,757
KY	Kentucky	30.0%	15.0%	20.0%	Not Filed						79.40%	36	53,105
LA	Louisiana	25.0%	0.0%	20.0%	Filed	72.8%	7/28/2021				50.00%	29	48,894
MA	Massachusetts	0.0%	0.0%	10.0%	Filed	72.8%	8/4/2021				10.00%	194	271,005
MD	Maryland	20.0%	15.0%	15.0%	Not Filed						58.70%	47	85,996
ME	Maine	35.0%	11.0%	19.9%	Not Filed						79.74%	23	48,371
MI	Michigan	34.0%	20.0%	20.0%	Approved	72.8%	8/9/2021	72.8%	8/30/2021	3-year phase-in increase of 20% each year	233.43%	113	170,706
MN	Minnesota	27.0%	0.0%	19.6%	Not Filed						51.89%	26	40,631
MO	Missouri	34.0%	20.0%	20.0%	Approved	72.8%	4/16/2021	72.8%	9/7/2021	3-year phase-in increase of 20% each year	233.43%	177	267,611
MS	Mississippi	25.0%	20.0%	20.0%	Not Filed						80.00%	11	22,489
MT	Montana	28.0%	20.0%	11.6%	Not Filed						71.42%	11	13,137
NC	North Carolina	33.0%	20.0%	20.0%	Filed	72.8%	4/15/2021				91.52%	322	564,210
ND	North Dakota	25.0%	15.0%	15.0%	Approved	72.8%	5/17/2021	44%	6/23/2021	2-year phase-in increase of 20% each year	138.05%	33	40,851
NE	Nebraska	31.0%	20.0%	20.0%	Filed	72.8%	7/13/2021				88.64%	201	276,572
NH	New Hampshire	34.0%	20.0%	10.0%	Not Filed						76.88%	22	51,243
NJ	New Jersey	10.0%	20.0%	10.3%	Filed	72.8%	9/14/2021				45.53%	98	151,004
NM	New Mexico	0.0%	8.0%	15.0%	Not Filed						24.20%	5	5,581
NV	Nevada	31.0%	20.0%	20.0%	Not Filed						88.64%	17	25,198
OH	Ohio	10.0%	20.0%	15.0%	Filed	72.8%	4/20/2021				51.80%	505	597,907
OK	Oklahoma	15.0%	20.0%	10.0%	Not Filed						51.80%	18	20,170
OR	Oregon	0.0%	0.0%	20.0%	Not Filed						20.00%	1	1,217
PA	Pennsylvania	25.0%	15.0%	20.0%	Filed	72.8%	8/9/2021				72.50%	168	297,462
RI	Rhode Island	28.0%	0.0%	44.0%	Not Filed						84.32%	23	44,163
SC	South Carolina	20.0%	20.0%	20.0%	Approved	72.8%	5/26/2021	15%	7/13/2021		98.72%	190	313,478
SD	South Dakota	37.0%	20.0%	20.0%	Not Filed						97.28%	20	38,157
TN	Tennessee	30.0%	10.0%	20.0%	Filed	72.8%	6/10/2021				71.60%	99	166,081
TX	Texas	23.0%	15.0%	20.0%	Disapproved	72.8%	8/17/2021	0%	9/9/2021		69.74%	335	433,422
UT	Utah	35.0%	0.0%	20.0%	Not Filed						62.00%	7	9,484
VA	Virginia	25.0%	0.0%	20.0%	Not Filed						50.00%	68	85,850
VT	Vermont	0.0%	0.0%	20.0%	Filed	72.8%	9/7/2021				20.00%	34	39,346
WA	Washington	15.0%	20.0%	20.0%	Filed	72.8%	5/20/2021				65.60%	139	237,447
WI	Wisconsin	0.0%	14.0%	9.6%	Filed	10.0%	5/21/2021				24.84%	73	108,229
WV	West Virginia	29.0%	20.0%	20.0%	Not Filed						85.76%	28	40,353
WY	Wyoming	25.0%	20.0%	20.0%	Not Filed						80.00%	4	5,383

September 27, 2021

Jim Laverty
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, Pennsylvania 17120

RE: JOHN ALDEN LIFE INSURANCE COMPANY

FORM NUMBER(S): J-5762-P-IA, J-5762-P-1-PA,
J-5875-P-IA, J-5875-P-IA (Q), J-5875-P-1-PA
TRACKING NUMBER: LFCR-132940309

Dear Jim Laverty:

Thank you for reviewing our filing. This is a response to your letter dated August 17, 2021 for the above referenced filing.

Objection 1

The 2011 filing (LFCR-127682409) for this block indicated that there were 187 policies in force. The 2016 filing (LFCR130749493) for this block affected 164 policies. The 2021 filing (LFCR-132940309) for this block had 202 policies. Why did the number of policies affected by the 2021 increase go up from 2016?

The numbers referenced from the prior filings indicated the number of policies, as opposed to number of policyholders.

In this filing, there are 202 policyholders, and 144 policies (Attachment A1 shows 144 policies). Both numbers are correct because there are some joint policies, which consist of 2 policyholders under a single policy.

Objection 2

Please provide a table in an Excel spreadsheet for the nationwide combined J-5762-P and J-5875-P block (perhaps similar to Exhibit F) which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the actual nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the current Pennsylvania rate level.

Exhibits similar to F, with earned premiums restated at the current Pennsylvania rate level from inception, are now provided. Please see Attachments Q2 in the attached file *JALIC PA Objection Response Attachments 08 17 21*.

Objection 3

Please provide a table in an Excel spreadsheet for the nationwide combined J-5762-P and J-5875-P block (perhaps similar to Exhibit F) which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the actual nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide.

Exhibits similar to F, with earned premiums restated at the original rate level from inception, are now provided. Please see Attachments Q3 in the attached file *JALIC PA Objection Response Attachments 08 17 21*.

Objection 4

Please provide the percent of active policyholders remaining in this block on a nationwide basis. How many policies were issued nationwide? How many policies remain in force nationwide?

There were 11013 policies issued nationwide with 16392 policyholders. There are 5397 policies remaining nationwide with 7447 policyholders.

The proportion of active policyholders remaining in this block on a nationwide basis is 45.4%.

Objection 5

Please provide the cumulative weighted average increase granted on the combined block in PA as a single number (or confirm it is 72.5%).

I confirm that the cumulative weighted average rate increase granted on the combined block in PA is 72.5%.

Objection 6

Please provide a listing of the past requested increases and approved increases by state. Also include a column showing the cumulative increases approved in each state.

For a complete rate increase status sheet by state on policy forms J-5762-P and J-5875-P, please refer to attachment Q6.1 and Q6.2 in the file *JALIC IL Objection Response Attachments 08 12 21*.

Objection 7

Please provide the letter that will be sent to policyholders to inform them of the increase and their available options.

Copies of the policyholder notification letters have been provided. Please refer to the following items:

- *J-NFO.pdf*
To be used for policies with a non-forfeiture rider

- *J-NPO.pdf*

To be used for policies without any non-forfeiture rider

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'P' followed by a horizontal line extending to the right.

Phillip Oh, FSA, MAAA
Consulting Actuary
818-867-2232
Phillip.Oh@LifeCareAssurance.com



Long Term Care Administrative Office
21600 Oxnard Street, Suite 1500
Mailing Address: Post Office Box 4243
Woodland Hills, CA 91365-4243
(888) 503-8104 / FAX (818) 887-4595

John Alden[®]
LIFE INSURANCE COMPANY

[DATE]

[INSURED NAME]
[INSURED ADDRESS]
[CITY, STATE, ZIP]

NOTICE OF PREMIUM RATE INCREASE

Re: John Alden Life Insurance Company Long-Term Care Insurance
[POLICY NUMBER]

Dear Policyholder,

What is Happening

We are writing to inform you of an upcoming premium increase of our long-term care policies, which will impact your current policy with our company.

To help ease the impact of this rate increase, we'll implement the increase in stages according to the schedule outlined below. We'll send you a notification letter in advance of each scheduled increase.

The first increase will be effective Month XX, 20YY, your next policy anniversary date. As a result, your [modal] premium payment will increase from \$xxx.xx to \$yyy.yy, beginning with the premium payment that is due Month XX, 20YY. Your premium will also increase effective Month XX, 20YY+1 and Month XX, 20YY+2.

Policy Anniversary	Premium after Rate Increase	Percent of Increase
Month XX, 20YY	xxxx.xx	zz.z%
Month XX, 20YY+1	xxxx.xx	zz.z%
Month XX, 20YY+2	xxxx.xx	zz.z%

Instead of paying the higher premiums, you can choose to change your policy's benefits or features. We've listed your options on the next page.

[If you have qualified for Waiver of Premium, your premiums will continue to be waived at the higher amount. Should premiums again become due on your policy, your billing notice will reflect the increased premium; should this occur, you are welcome to contact our customer service associates to discuss the options available to you that may help offset the increase in premium.]

Why it's Happening

Many factors have changed that impact the price of long-term care policies. For example, long-term care costs are rising, and people need long-term care longer because they're living longer. For these reasons, we're paying higher amounts of benefits. We need to increase premiums to keep up with costs.

You're not being singled out for a premium increase because of changes in the insured's age, health, claims history, or other individual characteristics.

Your long-term care insurance policy is guaranteed renewable. It means as long as you pay your premium, we cannot cancel or refuse to renew your policy, but we may increase premium rates.

What are My Options

We understand that a premium increase may be difficult, and we are committed to helping you understand your options so that you can make the best decision for your personal situation. Before you adjust your benefits or decide to forgo this coverage completely, you should discuss options with your financial advisor. Please keep in mind if you reduce your benefits, you will be unable to increase them in the future.

- **Benefit Amount Reduction:** By reducing your daily maximum benefit from [\$xxx.xx to \$yyy.yy], your [modal] premium would be [\$zzz.zz]. This is approximately the same rate you are currently paying for your policy. If your policy provides home and community-based care benefits, that daily benefit is reduced accordingly.
- **Benefit Period or Elimination Period Adjustments:** By adjusting other policy features, you may be able to reduce your premiums. These adjustments include lengthening your elimination period or shortening your overall maximum benefit period. The elimination period is the time during which you would be otherwise eligible for benefits but before you begin to receive payments. Depending on your needs, these adjustments may provide a better alternative than reducing your daily maximum benefit.
- **Review potential removal of riders:** Each rider included with your policy can be assessed for impact on the premium and your current and future coverage needs.
- **Nonforfeiture Option:** If you find that you are unable or unwilling to pay any further premiums on your policy, you may elect to exercise the nonforfeiture option provided by your policy. Under this option, if you choose not to pay any future premiums, your policy would lapse but coverage would continue according to the terms of your nonforfeiture rider. This option will automatically be provided if your policy lapses for non-payment of premium.

Should you wish to continue your policy at its current coverage level at the increased premium, you only need to pay the indicated premium when you are billed. No further action is required.

If you would like information on alternatives to the policy changes specified on the enclosed Coverage Change Request Form, please contact customer service at the number listed at the end of this letter. They will be able to provide you with more information on possible benefit adjustment alternatives and the premium impact.

If you choose to modify your coverage at this time, please complete the enclosed Coverage Change Request Form and return it to the indicated address by [Month, XX, 20YY]. In doing so, you will ensure your requested changes are processed prior to [Month XX, 20YY], the date on which the premium increase for your policy takes effect.

If your Coverage Change Request Form is not received prior to [Month XX, 20YY], your benefits will remain unchanged and your coverage will lapse if the increased premium is not received by the end of the grace period provided by your policy.

If you have questions about this letter, the premium increase, the attached Coverage Change Request Form or the options available to you, please contact our customer service associates at 888-503-8104, Monday through Friday, from 7 a.m. to 5 p.m. Pacific Time.

Sincerely,

John Alden Life Insurance Company

Enclosure



Long Term Care Administrative Office
21600 Oxnard Street, Suite 1500
Mailing Address: Post Office Box 4243
Woodland Hills, CA 91365-4243
(888) 503-8104 / FAX (818) 887-4595

[DATE]

[INSURED NAME]

[INSURED ADDRESS]

[CITY, STATE, ZIP]

COVERAGE CHANGE REQUEST FORM

Re: Your Long-Term Care Insurance [POLICY NUMBER]

If you elect to modify your existing coverage in order to offset the upcoming premium increase on your policy, please indicate as such below and return this form in the enclosed postage paid envelope to:

John Alden Life Insurance Company
Long Term Care Administrative Office
P.O. Box 4243
Woodland Hills, CA 91365-4243

To ensure that your requested changes are received and processed prior to the date upon which your premium increase takes effect, please return this form by [Month XX, 20YY]. If your Coverage Change Request Form is not received by [Month XX, 20YY], your policy benefits will remain unchanged and your coverage will lapse if the increased premium is not received by the end of the grace period provided by your policy.

It is important that you make any policy changes after careful consideration of your personal needs and circumstances as you will not be able to increase coverage under your policy in the future.

If you wish to discuss other options, please contact your agent or our office at 888-503-8104.

Please indicate your choice by checking one of the options below. If you do not check any option or do not return this form, there will be no changes to your policy other than the premium rate increase described in the attached letter.

☐ Reduce my current daily benefit amount from [\$xxx.xx to \$yyy.yy] which will result in a [modal] premium of [\$zzz.zz] beginning with the premium payment that is due [Month XX, 20YY]. If your policy provides home and community based care benefits, that daily benefit is reduced accordingly.

☐ Exercise the Nonforfeiture Option provided by my policy.

Signature of Policyholder

Date Signed

Signature of Joint Policyholder (if applicable)

Date Signed



Long Term Care Administrative Office
21600 Oxnard Street, Suite 1500
Mailing Address: Post Office Box 4243
Woodland Hills, CA 91365-4243
(888) 503-8104 / FAX (818) 887-4595

[DATE]

[INSURED NAME]
[INSURED ADDRESS]
[CITY, STATE, ZIP]

NOTICE OF PREMIUM RATE INCREASE

Re: John Alden Life Insurance Company Long-Term Care Insurance
[POLICY NUMBER]

Dear Policyholder,

What is Happening

We are writing to inform you of an upcoming premium increase of our long-term care policies, which will impact your current policy with our company.

To help ease the impact of this rate increase, we'll implement the increase in stages according to the schedule outlined below. We'll send you a notification letter in advance of each scheduled increase.

The first increase will be effective Month XX, 20YY, your next policy anniversary date. As a result, your [modal] premium payment will increase from \$xxx.xx to \$yyy.yy, beginning with the premium payment that is due Month XX, 20YY. Your premium will also increase effective Month XX, 20YY+1 and Month XX, 20YY+2.

Policy Anniversary	Premium after Rate Increase	Percent of Increase
Month XX, 20YY	xxxx.xx	zz.z%
Month XX, 20YY+1	xxxx.xx	zz.z%
Month XX, 20YY+2	xxxx.xx	zz.z%

Instead of paying the higher premiums, you can choose to change your policy's benefits or features. We've listed your options on the next page.

[If you have qualified for Waiver of Premium, your premiums will continue to be waived at the higher amount. Should premiums again become due on your policy, your billing notice will reflect the increased premium; should this occur, you are welcome to contact our customer service associates to discuss the options available to you that may help offset the increase in premium.]

Why it's Happening

Many factors have changed that impact the price of long-term care policies. For example, long-term care costs are rising, and people need long-term care longer because they're living longer. For these reasons, we're paying higher amounts of benefits. We need to increase premiums to keep up with costs.

You're not being singled out for a premium increase because of changes in the insured's age, health, claims history, or other individual characteristics.

Your long-term care insurance policy is guaranteed renewable. It means as long as you pay your premium, we cannot cancel or refuse to renew your policy, but we may increase premium rates.

What are My Options

We understand that a premium increase may be difficult, and we are committed to helping you understand your options so that you can make the best decision for your personal situation. Before you adjust your benefits or decide to forgo this coverage completely, you should discuss options with your financial advisor. Please keep in mind if you reduce your benefits, you will be unable to increase them in the future.

- **Benefit Amount Reduction:** By reducing your daily maximum benefit from [\$xxx.xx to \$yyy.yy], your [modal] premium would be [\$zzz.zz]. This is approximately the same rate you are currently paying for your policy. If your policy provides home and community-based care benefits, that daily benefit is reduced accordingly.
- **Benefit Period or Elimination Period Adjustments:** By adjusting other policy features, you may be able to reduce your premiums. These adjustments include lengthening your elimination period or shortening your overall maximum benefit period. The elimination period is the time during which you would be otherwise eligible for benefits but before you begin to receive payments. Depending on your needs, these adjustments may provide a better alternative than reducing your daily maximum benefit.
- **Review potential removal of riders:** Each rider included with your policy can be assessed for impact on the premium and your current and future coverage needs.
- **Non-Payment Option:** If you find that you are unable or unwilling to pay any further premiums on your policy, John Alden Life Insurance Company is offering a non-payment option to our long-term care customers. Under this option, if you choose not to pay any future premiums, instead of your policy lapsing and providing no future coverage, it will continue under its current terms, but benefits payable under the policy will be limited to an amount equal to the premiums you have paid into your policy, or 30 times the daily benefit on the rate increase effective date, whichever is greater. No further benefit increases will occur under any Benefit Increase Rider, if attached to the policy. This option will automatically be provided if your policy lapses for non-payment of premium within 120 days of the rate increase effective date.

Should you wish to continue your policy at its current coverage level at the increased premium, you only need to pay the indicated premium when you are billed. No further action is required.

If you would like information on alternatives to the policy changes specified on the enclosed Coverage Change Request Form, please contact customer service at the number listed at the end of this letter. They will be able to provide you with more information on possible benefit adjustment alternatives and the premium impact.

If you choose to modify your coverage at this time, please complete the enclosed Coverage Change Request Form and return it to the indicated address by [Month, XX, 20YY]. In doing so, you will ensure your requested changes are processed prior to [Month XX, 20YY], the date on which the premium increase for your policy takes effect.

If your Coverage Change Request Form is not received prior to [Month XX, 20YY], your benefits will remain unchanged and your coverage will lapse if the increased premium is not received by the end of the grace period provided by your policy.

If you have questions about this letter, the premium increase, the attached Coverage Change Request Form or the options available to you, please contact our customer service associates at 888-503-8104, Monday through Friday, from 7 a.m. to 5 p.m. Pacific Time.

Sincerely,

John Alden Life Insurance Company

Enclosure



Long Term Care Administrative Office
21600 Oxnard Street, Suite 1500
Mailing Address: Post Office Box 4243
Woodland Hills, CA 91365-4243
(888) 503-8104 / FAX (818) 887-4595

[DATE]

[INSURED NAME]

[INSURED ADDRESS]

[CITY, STATE, ZIP]

COVERAGE CHANGE REQUEST FORM

Re: Your Long-Term Care Insurance [POLICY NUMBER]

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Long Term Care Administrative Office
P.O. Box 4243
Woodland Hills, CA 91365-4243

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It is important that you make any policy changes after careful consideration of your personal needs and circumstances as you will not be able to increase coverage under your policy in the future.

If you wish to discuss other options, please contact your agent or our office at 888-503-8104.

Please indicate your choice by checking one of the options below. If you do not check any option or do not return this form, there will be no changes to your policy other than the premium rate increase described in the attached letter.

☐ Reduce my current daily benefit amount from [\$xxx.xx to \$yyy.yy] which will result in a [modal] premium of [\$zzz.zz] beginning with the premium payment that is due [Month XX, 20YY]. If your policy provides home and community based care benefits, that daily benefit is reduced accordingly.

☐ Exercise the Non-Payment Option.

Signature of Policyholder

Date Signed

Signature of Joint Policyholder (if applicable)

Date Signed

October 5, 2021

James Lavery
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, Pennsylvania 17120

RE: JOHN ALDEN LIFE INSURANCE COMPANY

FORM NUMBER(S): J-5762-P-IA, J-5762-P-1-PA,
J-5875-P-IA, J-5875-P-IA (Q), J-5875-P-1-PA
TRACKING NUMBER: LFCR-132940309

Dear James Lavery:

Thank you for reviewing our filing. This is a response to your letter dated October 5, 2021 for the above referenced filing.

Objection 1

- (i) Attachment Q2 is labeled “Nationwide Experience Projection With Restated Earned Premiums at the Current Pennsylvania Rate Level from Inception”.
- (ii) Attachment Q3 is labeled “Nationwide Experience Projection With Restated Earned Premiums at the Original Rate Level from Inception”.
- (iii) The cumulative increase approved in PA to date is 72.5% (i.e. $72.5 = 1.25 * 1.15 * 1.2 - 1$).
- (iv) The 1992 “original rate level” earned premium shown in Attachment Q3 is \$25,360.
- (v) The 1992 “current PA rate level since inception” earned premium shown in Attachment Q3 is similarly \$25,360.

Given the above information, shouldn’t the 1992 “current PA rate level since inception” earned premium shown in Attachment Q2 be $(\$25,360) * (1.725) = \$43,746$?

Please revise Attachment Q2 or explain why it is currently correct.

Attachment Q2 has been revised to show the nationwide experience projection at the current PA rate level since inception. Please refer to Attachment Q2 in the file *JALIC PA Objection Response Attachments 10 05 21.xlsx*.

For clarification, the prior version of Attachment Q2 mistakenly provided the earned premiums restated to the PA rate level based upon the historical year, and not restated to the current PA rate level (e.g. there were no rate increases in 1992, so the prior version of Q2 also showed \$25,360). This issue has been fixed in the revised Attachment Q2.

Objection 2

Please provide Attachment Q2 and Attachment Q3 in Excel.

Attachment Q2 and Q3 have been provided in Excel. Please find the attached file *JALIC PA Objection Response Attachments 10 05 21.xlsx*.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'P' followed by a horizontal line extending to the right.

Phillip Oh, FSA, MAAA
Consulting Actuary
818-867-2232
Phillip.Oh@LifeCareAssurance.com

October 27, 2021

Michael Hibbert
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, Pennsylvania 17120

RE: JOHN ALDEN LIFE INSURANCE COMPANY

FORM NUMBER(S): J-5762-P-PA, J-5762-P-1-PA,
J-5875-P-PA, J-5875-P-PA (Q), J-5875-P-1-PA
TRACKING NUMBER: LFCR-132940309

Dear Michael Hibbert:

Thank you for reviewing our filing. This is a response to your letter dated October 25, 2021 for the above referenced filing.

Objection

The Department cannot approve this filing as submitted but we can offer a 20% increase on the above captioned forms.

If John Alden would like to accept our 20% offer, then please respond with an acceptance letter.

The company accepts the offer of a 20% increase. Please find the revised rate tables reflecting a 20% rate increase attached as: *John Alden PA Revised Rate Tables 20%.pdf*.

Sincerely,

A handwritten signature in black ink, appearing to be 'Phillip Oh', with a long horizontal line extending to the right.

Phillip Oh, FSA, MAAA
Consulting Actuary
818-867-2232
Phillip.Oh@LifeCareAssurance.com